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Attorneys for Defendant, ORLY TAITZ

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**

LISA LIBERI, PHILIP J. BERG,  
ESQUIRE, THE LAW OFFICES OF  
PHILIP J. BERG, LISA M. OSTELLA  
and GO EXCEL GLOBAL,

Plaintiffs,

vs.

ORLY TAITZ, a/k/a DR. ORLY TAITZ,  
a/k/a LAW OFFICES OF ORLY TAITZ;  
a/k/a WWW.ONLYTAITZESQ.COM  
a/k/a WWW.REPUBX.COM a/k/a  
ORLY TAITZ, INC. and DEFEND OUR  
FREEDOMS FOUNDATIONS, INC., et  
al.; and DOES 1 through 200 Inclusive,

Defendants.

) Case No. 8:11-CV-00485-AG (AJW)  
) Hon. Andrew Guilford  
) Courtroom 10D  
)

) **NOTICE OF MOTION AND**  
) **MOTION BY DEFENDANT, ORLY**  
) **TAITZ, FOR AWARD OF**  
) **ATTORNEYS' FEES AND COSTS**  
) **AGAINST PLAINTIFF, LISA**  
) **OSTELLA, PURSUANT TO CAL.**  
) **CODE OF CIVIL PROCEDURE**  
) **SECTION 425.16(c) ;**  
) **MEMORANDUM OF POINTS AND**  
) **AUTHORITIES; SUPPORTING**  
) **DECLARATION**

) **[Filed with Motions to Dismiss and to**  
) **Strike]**

) Date: October 17, 2016  
) Time: 10:00 a.m.  
) Courtroom: 10D  
)

) Date Action Filed: May 4,  
) 2009  
) Trial Date: None  
)

**TO THE COURT, ALL PARTIES, AND/OR THEIR ATTORNEYS OF  
RECORD:**

**PLEASE TAKE NOTICE** that on October 17, 2016 at 10:00 a.m. or as soon as the matter may be heard in Courtroom 10D of the above-entitled Court, located at 411 West Fourth Street, Santa Ana, California 92701-4516, Defendant, ORLY TAITZ (“Taitz”), will and hereby does move for an order pursuant to Cal. Code Civ. Proc. section 425.16(c) (“Anti-SLAPP statute”) for an award of attorneys’ fees and costs of \$286,852.22 against Plaintiff, LISA OSTELLA (“Ostella”). This amount consists of attorney's fees of \$282,321.50 plus costs of \$4,530.72.

This motion is made following the conference of counsel for Plaintiffs Liberi, Ostella and Go Excel Global pursuant to L.R. 7-3 which took place on July 6, 2016. Taitz’s counsel attempted to confer with Plaintiff Philip Berg via email and telephone, but Mr. Berg did not respond to these efforts. This motion is also made pursuant to the Court’s granting of leave to Taitz to file it (Dkt. Nos. 632 and 679).

This Motion will be based upon this Notice, the attached Memorandum of Points and Authorities in support thereof, the concurrently-filed Declaration of Jeffrey P. Cunningham, Esq. and the attorneys’ fees and costs billing statements attached thereto, Taitz and related Defendants’ concurrently-filed Motions to dismiss and to strike (*which are incorporated herein by this reference as though fully set forth*), and all other tangible and/or testimonial evidence provided at the hearing on this matter.

DATED: September 12, 2016

**SCHUMANN | ROSENBERG**

By: /s/ - Jeffrey P. Cunningham  
Kim Schumann, Esq.  
Jeffrey P. Cunningham, Esq.  
Attorneys for Defendant,  
ORLY TAITZ

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## **FEDERAL RULES AND STATUTES**

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**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. INTRODUCTION**

Plaintiffs, Ostella, LISA LIBERI (“Liberi”), PHILIP J. BERG, ESQUIRE, THE LAW OFFICES OF PHILIP J. BERG, and GO EXCEL GLOBAL (collectively “Plaintiffs”), filed this action in May 2009 in the United States District Court for the Eastern District of Pennsylvania.

In March 2011, the case was severed, with one portion being transferred to this Court.

The case has been vigorously litigated, including the prosecution of three appeals (two by Taitz and Defendant, DEFEND OUR FREEDOMS FOUNDATIONS (“DOFF”), and one by Plaintiffs).

In May 2013, Taitz filed her anti-SLAPP motion to strike Plaintiffs’ First Amended Complaint (“FAC”) (Dkt. No 618). The District Court denied Taitz’s motion. In July 2013, Taitz appealed from the order denying her motion (Case No. 13-56253).

In April 2016, the Court of Appeals issued its Memorandum (Dkt. No. 676) in Case No. 13-56253 [consolidated with Case No. 13-56250, an appeal by DOFF], finding that “Appellants’ speech at issue concerns matters of public importance, [and thus] the first prong of California anti-SLAPP is satisfied.” (Memorandum, pg. 5.)

[Taitz and co-Defendants, DEFEND OUR FREEDOMS FOUNDATIONS, ORLY TAITZ, INC., and LAW OFFICES OF ORLY TAITZ, in connection with their concurrently-filed Motions to dismiss and to strike, seek judicial notice pursuant to Fed. R. Evid. 201 of the Court of Appeals’ Memorandum - Request for Judicial Notice Item 2.]

1 The Court of Appeals also reversed the District Court's order, finding that  
2 Liberi and Ostella did not meet their burden under California's anti-SLAPP statute,  
3 and dismissing certain claims of the FAC as follows:

- 4 1. Dismissing the Fifth Claim for Relief, for Violation of the California  
5 Information Privacy Act § 1798.53, brought by Liberi and Ostella;
- 6 2. Dismissing the Tenth Claim for Relief, for Malicious Prosecution,  
7 brought by Liberi; and
- 8 3. Dismissing the Eleventh Claim for Relief, for Abuse of Process,  
9 brought by Liberi. (Memorandum, pgs. 6-7.)

10 On September 9, 2016, Liberi dismissed her claims against Taitz and related  
11 Defendants with prejudice.

12 Taitz is thus the prevailing party in her appeal as against Liberi and Ostella,  
13 and is therefore entitled to a mandatory award of attorneys' fees and costs pursuant  
14 to Cal. Code Civ. Proc. section 425.16(c) against Ostella.

## 15 **II. LEGAL ARGUMENT AND AUTHORITY**

### 16 **A. Cal. Code Civ. Proc. section 425.16(c) Mandates an Award of** 17 **Reasonable Attorneys' Fees and Costs to Parties Subjected to** 18 **Strategic Lawsuits Against Public Participation**

19 Cal. Code Civ. Proc. section 425.16(c)(1) provides in relevant part: "Except  
20 as provided in paragraph (2), in any action subject to subdivision (b), a prevailing  
21 defendant on a special motion to strike shall be entitled to recover his or her  
22 attorney's fees and costs." [Section 425.16(c)(2) is inapplicable where it applies  
23 only to an action "brought pursuant to Section 6259, 11130, 11130.3, 54960, or  
24 54960.1 of the Government Code."]

25 The fee-shifting provision of California's anti-SLAPP statute is broadly  
26 construed so as to effectuate legislative purpose of reimbursing a prevailing  
27 defendant. *Graham-Sult v. Clainos*, 756 F.3d 724, 752 (9th Cir. 2014). State law

1 governs attorney's fees awards based on state fee-shifting laws, like California's  
2 anti-SLAPP statute. *Northon v. Rule*, 637 F.3d 937, 938 (9th Cir.2011).

3 The anti-SLAPP statute is "intended to compensate a defendant for the  
4 expense of responding to a SLAPP suit. To this end, the provision is broadly  
5 construed so as to effectuate the legislative purpose of reimbursing the prevailing  
6 defendant for expenses incurred in extracting herself from a baseless lawsuit."  
7 *Wanland v. Law Offices of Mastagni, Holstedt & Chiurazzi*, 141 Cal.App.4th 15, 20  
8 (2006). Thus, fees and costs awarded are not limited to those incurred specifically  
9 in prosecution of an anti-SLAPP motion. *Ibid. Graham-Sult*, 756 F.3d at 752.

10 A defendant is entitled to attorney's fees and costs for appealing a trial court  
11 order denying his or her anti-SLAPP motion. *White v. Lieberman*, 103 Cal.App.4th  
12 210, 220 (2002).

13 Here - as applicable to Ostella - Taitz prevailed on her anti-SLAPP motion as  
14 to the Fifth Claim for Relief of the FAC, and is thus entitled to an award of her  
15 reasonable attorneys' fees and costs against Ostella under Cal. Code of Civil  
16 Procedure section 425.16(c)(1).

17 **B. Cal. Code Civ. Proc. Section 425.16(c) Mandates an Award of**  
18 **Reasonable Attorneys' Fees and Costs Where Defendant's Motion**  
19 **is Granted as to Some But Not All of Plaintiff's Claims**

20 The Legislature requires that Cal. Code Civ. Proc. section 425.16 be  
21 "construed broadly." *Evans v. Unkow*, 38 Cal.App 4th 1490, 1500 (1995).

22 An award of attorneys' fees and costs is proper even if the anti-SLAPP  
23 motion is granted as to only some of a plaintiff's claims. *ComputerXpress, Inc. v.*  
24 *Jackson*, 93 Cal.App.4th 993, 1020 (2001). *Coltrain v. Shewalter*, 66 Cal.App.4th  
25 94, 108 (1998).

26 The concept of what renders a litigant a prevailing party is to be broadly  
27 construed. *Lin v. City of Pleasanton*, 176 Cal.App.4th 408, 425-26 (2009) ("The



1 term 'prevailing party' must be 'interpreted broadly to favor an award of attorney  
2 fees to a partially successful defendant.'")

3 The attorney fees provision of the California's anti-SLAPP) statute is broadly  
4 construed; an award is proper even if the anti-SLAPP motion is granted as to only  
5 some of a plaintiff's claims. *New.Net, Inc. v. Lavasoft*, 356 F.Supp.2d 1090, 1115  
6 (C.D.Cal.2004).

7 Here, Taitz prevailed on some but not all of the claims of the FAC -  
8 specifically, on the Fifth Claim for Relief by Ostella and Liberi, and the Tenth and  
9 Eleventh Claims for Relief by Liberi.

10 Taitz is thus entitled to an award of attorneys' fees and costs from Ostella.  
11 *New.Net, Inc.*, 356 F.Supp.2d at 1115. *ComputerXpress, Inc.*, 93 Cal.App.4th at  
12 1020. *Lin*, 176 Cal.App.4th at 425-26.

13 **C. Taitz is Entitled to an Award of Her Reasonable Attorney's Fees**  
14 **and Costs of \$286,852.22 Against Ostella Pursuant to Cal. Code**  
15 **Civ. Proc. Section 425.16(c)**

16 As stated, Plaintiffs filed this "SLAPP" case seven years ago in 2009. It has  
17 been vigorously litigated including in three appeals. This includes Taitz's and  
18 DOFF's appeals resulting in the Court of Appeals' subject decision, in which Taitz  
19 was the prevailing party as against Ostella and Liberi.

20 "An award of fees may include not only the fees incurred with respect to the  
21 underlying claim, but also the fees incurred in enforcing the right to mandatory fees  
22 under section 425.16." *Ketchum v. Moses*, 24 Cal.4th 1122, 1132 (2001).

23 The appropriate number of hours include all time 'reasonably expended in  
24 pursuit of the ultimate result achieved...." *Hensley v. Eckerhart* (1983) 461 U.S.  
25 424, 431, 103 S.Ct. 1933, 76 L.Ed.2d 40 (1983) (abrogated on other grounds by  
26 *Tex. State Teachers Ass'n. v. Garland Indep. Sch. Dist.*, 489 U.S. 782, 109 S.Ct.  
27 1486, 103 L.Ed.2d 866 (1989)).

1 “The most useful starting point for determining the amount of a reasonable  
2 fee is the number of hours reasonably expended on the litigation multiplied by a  
3 reasonable hourly rate.” *Hensley*, 461 U.S. at 433. “In determining a reasonable  
4 hourly rate, the district court should be guided by the rate prevailing in the  
5 community for similar work performed by attorneys of comparable skill,  
6 experience, and reputation.” *Chalmers v. City of Los Angeles*, 796 F.2d 1205, 1210-  
7 11 (9th Cir. 1986). “Generally, the relevant community is the forum in which the  
8 district court sits.” *Barjon v. Dalton*, 132 F.3d 496, 500 (9th Cir. 1997) (citing  
9 *Davis v. Mason County*, 927 F.2d 1473, 1488 (9th Cir. 1991)).

10 “The party opposing the fee application has a burden of rebuttal that requires  
11 submission of evidence to the district court challenging the accuracy and  
12 reasonableness of the hours charged or the facts asserted by the prevailing party in  
13 its submitted affidavits.” *Gates v. Deukmejian*, 987 F.2d 1392, 1397-98 (9th Cir.  
14 1993). *Premier Medical Management Systems, Inc. v. California Ins. Guarantee*  
15 *Assn.*, 163 Cal.App.4th 550, 564 (2008).

16 As the Supreme Court of California has explained, “...fees recoverable ...  
17 ordinarily include compensation for all hours reasonably spent, including those  
18 necessary to establish and defend the fee claim.” *Serrano v. Unruh*, 32 Cal.3d 621,  
19 639 (1982).

20 The award of attorneys’ fees and costs sought by Taitz is reasonable given  
21 the realities of this case - she was dragged into litigation on the East Coast (the  
22 District Court in Pennsylvania) in 2009, successfully moved to have the portion of  
23 the case involving her and related Defendants transferred to the Central District of  
24 California, successfully defended against Plaintiffs’ appeal to the Third Circuit  
25 Court of Appeals, and after two attempts to obtain relief under California’s anti-  
26 SLAPP statute, was ultimately granted such relief by the Ninth Circuit Court of  
27 Appeals. It found that “Appellants’ speech at issue concerns matters of public

1 importance, [and thus] the first prong of California anti-SLAPP is satisfied” and  
2 that Liberi and Ostella failed to meet their burdens as to the Fifth, Tenth and  
3 Eleventh Claims for Relief.

4 As shown in the attached declaration and the attorneys’ fees and costs  
5 billings attached to it, the amount sought herein is reasonable and should be  
6 awarded to Taitz and against Ostella.

7 **III. CONCLUSION**

8 For the reasons stated herein, Taitz respectfully submits that an award of  
9 attorneys’ fees and costs as prayed should be made against Ostella.

10  
11 DATED: September 12, 2016

**SCHUMANN | ROSENBERG**

12  
13 By: /s/ - Jeffrey P. Cunningham  
14 Kim Schumann, Esq.  
15 Jeffrey P. Cunningham, Esq.  
16 Attorneys for Defendant,  
17 ORLY TAITZ  
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**DECLARATION OF JEFFREY P. CUNNINGHAM, ESQ.**

I, Jeffrey P. Cunningham, declare as follows:

1. I am an attorney duly licensed to practice law in all courts of the State of California and the United States District Court for the Central District of California, and am a Partner in Schumann | Rosenberg, attorneys of record for Defendant, ORLY TAITZ (“Taitz”). I make this declaration based on my personal knowledge of the facts stated herein. I gained my personal knowledge of the facts stated herein by virtue of my participation in the events described herein, my review of the documents described herein, or some combination of the foregoing as identified herein. If called to testify to the facts stated herein, I could and would do so competently and truthfully.

2. I am a 1990 graduate of the University of Southern California Law School. I was admitted to the California Bar in December 1990. I was admitted to practice in the Ninth Circuit in December 1990. I have practiced law on a full time basis continuously since December 1990.

3. Kim Schumann, Esq. is a Partner of Schumann | Rosenberg. He is a 1994 graduate of the Western State University College of Law. He was admitted to the California Bar in June 1994. He was admitted to practice in the Ninth Circuit in December 1994. Mr. Schumann has practiced law on a full time basis continuously since June 1994.

4. Our office began representing Taitz in the case captioned above in June 2011. We have represented her continuously in this case since June 2011.

5. I have reviewed and am thus familiar with all attorneys’ fees and costs billings issued by our office in this case. Attached hereto as “Exhibit A” are true copies of our billings for attorneys’ fees and costs in this case, through August 2016.

8. Those billings reflect that Taitz was charged attorneys' fees through August 2016 of \$272,905.00. They also reflect that Taitz incurred costs through August 2016 of \$4,530.72.

19 I hereby declare under penalty of perjury under the laws of the United States  
20 of America that the above is true and correct.

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8

**“Exhibit A”**

Schumann | Rosenberg  
Attorneys at Law  
3100 Bristol Street, Suite 100  
Costa Mesa, CA 92626  
Tax ID No.: 52-2265846  
(714)-850-0210

Invoice submitted to:  
Laurie Johnson  
Chubb Group of Insurance Companies  
555 S. Flower St., 5th Floor  
Los Angeles, CA 90071

September 09, 2016  
In Reference To: Liberi vs. Taitz  
Our File No.: CH-078  
Your File No.: 047511021455  
Insured: Orly Taitz and Yosef Taitz  
Claimant: Liberi  
S | R Federal Tax Id No.: 52-2265846

Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
6/24/2011	- PC	Review potential new federal Chubb case from Orly Taitz regarding defamation lawsuit; identify media coverage of lawsuit.	0.80 170.00/hr	136.00
	- PC	Review new federal case from Orly Taitz regarding defamation lawsuit; [REDACTED] [REDACTED]	0.70 170.00/hr	119.00
7/5/2011	- PC	Review federal case docket (approximately 200 line items) and case procedural history in preparation of meeting with new clients.	1.50 170.00/hr	255.00
7/6/2011	- KS	Telephone calls with new client regarding attack on pleadings.	0.80 170.00/hr	136.00
	- JC	Meeting with clients O. and Y. Taitz in Liberi v. Taitz case.	3.00 170.00/hr	510.00
	- KS	Joint meeting with clients.	3.00 170.00/hr	510.00
	- PC	Meeting with potential new clients Orly Taitz and husband Yosef Taitz, [REDACTED] [REDACTED] [REDACTED] [REDACTED]	3.00 170.00/hr	510.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/7/2011	- KS	Meeting with clients.	1.40 170.00/hr	NO CHARGE
	- PC	Begin review of case file, including review of relevant legal documents identified by client: Complaint, Anti-SLAPP Motions, Motion for Leave to File Amended Complaint.	1.00 170.00/hr	170.00
	- JC	Lengthy meeting with clients [REDACTED] [REDACTED] [REDACTED]	1.40 170.00/hr	238.00
	- PC	Begin review of Plaintiff's 180-page First Amended Complaint.	1.20 170.00/hr	204.00
	- PC	Draft analysis on response deadlines for client Orly Taitz, and for Orly's related entities; as well as analysis of response deadline for Yosef Taitz and related entities.	0.80 170.00/hr	136.00
	- PC	Review correspondence from client regarding status and strategy of anti-SLAPP motion.	0.20 170.00/hr	34.00
	- PC	Review Anti-SLAPP motion draft to First Amended Complaint drafted by Taitz's prior counsel.	0.50 170.00/hr	85.00
	- PC	Review Declaration of Orly Taitz supporting Anti-SLAPP motion draft to First Amended Complaint drafted by Taitz's prior counsel.	0.50 170.00/hr	85.00
	- PC	Further detailed review and analysis of 180-page first amended Complaint in preparation [REDACTED] [REDACTED]	3.20 170.00/hr	544.00
	- PC	Review Stipulation to Dismiss Yosef Taitz in preparation for drafting meet and confer regarding dismissal of Yosef.	0.40 170.00/hr	68.00
	- PC	Analyze Court's Order Granting Leave to Amend [REDACTED] [REDACTED] [REDACTED]	1.20 170.00/hr	204.00
	- PC	Analyze prior Court's Order on request for Preliminary Injunction.	1.00 170.00/hr	170.00
	- JC	Begin review of voluminous file materials in Liberi v. Taitz case, including clients' SLAPP motions, [REDACTED] [REDACTED] [REDACTED] [REDACTED] Begin research regarding preparation of various motions for clients, including to dismiss and to strike amended complaint.	3.60 170.00/hr	612.00
	- KS	Telephone call with carrier regarding future handling.	0.20 170.00/hr	34.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
7/7/2011	- KS	Multiple correspondence with client regarding case handling.	0.80 170.00/hr	136.00
7/8/2011	- PC	Review and analyze draft Motion to Stay Proceedings pending appeal on behalf of Orly Taitz pursuant to carrier authority by Laurie Johnson.	1.70 170.00/hr	289.00
	- PC	Conference with counsel [REDACTED] [REDACTED] pursuant to carrier authority by Laurie Johnson.	0.70 170.00/hr	119.00
	- PC	Review news articles submitted by client regarding case and facts regarding Plaintiffs and Plaintiffs' legal strategy.	1.00 170.00/hr	170.00
	-	[REDACTED]		
	- JC	Begin analysis of potential motions to quash service and to dismiss for defendants, Law Offices of O. Taitz and Orly Taitz, Inc.	0.70 170.00/hr	119.00
	- PC	Review draft 12(b)(6) motion drafted by prior attorneys for client pursuant to carrier authority from Laurie Johnson.	1.60 170.00/hr	272.00
	- JC	Begin review of clients' motion to stay case pending appeal.	0.60 170.00/hr	102.00
	- PC	Review documents for use in judicial notice in support of Motion to Dismiss, bankruptcy records and criminal records of Plaintiff Liberi. Pursuant to authority granted by carrier, Laurie Johnson.	2.00 170.00/hr	340.00
	- PC	Begin drafting Motion to Dismiss on behalf of Orly Taitz; draft and revise Introduction section, and create outline of legal arguments. Pursuant to authority granted by carrier, Laurie Johnson.	1.70 170.00/hr	289.00
	-	[REDACTED]		
	- PC	Conferencing with client regarding case status, motion status, and case strategy.	1.00 170.00/hr	170.00
	- PC	Conference with client regarding substitution, status of case.	0.50 170.00/hr	85.00
	- KS	Preparation of correspondence to client regarding update.	0.20 170.00/hr	34.00
	- KS	Correspondence with client regarding court order.	0.30 170.00/hr	51.00

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			Hrs/Rate	Amount
7/8/2011	- KS	Correspondence with client regarding stay of proceedings.	0.20 170.00/hr	34.00
	- KS	Conference regarding future handling.	0.40 170.00/hr	68.00
7/10/2011	- KS	Conference regarding Law & Motion filings.	0.60 170.00/hr	102.00
	- JC	Begin analysis of issues regarding [REDACTED] [REDACTED] [REDACTED] [REDACTED]	1.30 170.00/hr	221.00
	- PC	Continue drafting Motion to Dismiss on behalf of Orly Taitz as to each of 11 causes of action and approximately 600 allegations. Pursuant to authority granted by carrier, Laurie Johnson.	5.00 170.00/hr	850.00
7/11/2011	- MLC	Prepare Notice of Association of Counsel Pending Approval of Substitution of Attorney, for filing and service.	0.10 95.00/hr	9.50
	- MLC	Telephone call with counsel for Defendant, Intellius, Inc., regarding information on case.	0.10 95.00/hr	9.50
	- MLC	Begin initial revisions of 12(b)(6) Motion to Dismiss pursuant to carrier authority from Laurie Johnson.	0.40 95.00/hr	38.00
	- KM	Review and analyze of California and Federal decisional authority regarding [REDACTED] [REDACTED] [REDACTED] Pursuant to authority granted by carrier, Laurie Johnson.	1.10 170.00/hr	187.00
	- MLC	Prepare Table of Contents and Table of Authorities for Defendant's Motion to Dismiss Plaintiffs' First Amended Complaint Pursuant to FRCP 12(b)(6). Pursuant to authority granted by carrier, Laurie Johnson.	1.70 95.00/hr	161.50
	- MLC	Further review and revise Defendant's Motion to Dismiss Plaintiff's First Amended Complaint Pursuant to FRCP 12(b)(6), for filing and service. Pursuant to authority granted by carrier, Laurie Johnson.	0.70 95.00/hr	66.50
	- JC	Continue analysis of issues regarding [REDACTED] [REDACTED] [REDACTED] [REDACTED]	0.70 170.00/hr	119.00
	- AP	Begin drafting memorandum regarding [REDACTED] [REDACTED]	1.80 95.00/hr	171.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/11/2011	- PC	Submit draft of 12(b)(6) motion to dismiss to client for review, conference regarding the same pursuant to carrier authority from Laurie Johnson.	1.20 170.00/hr	204.00
	- PC	Revisions and addition of new legal arguments into Motion to Dismiss pursuant to client revisions; finalization of Motion for filing pursuant to carrier authority from Laurie Johnson.	3.30 170.00/hr	561.00
	- PC	Review and analyze client's Motion to dismiss pursuant to 12(b)(6) on behalf of "Defend Our Freedoms Foundation" pursuant to carrier authority from Laurie Johnson.	1.40 170.00/hr	238.00
	- PC	Review and analyze client's Motion to dismiss pursuant to 12(b)(1) - lack of jurisdiction - on behalf of "Defend Our Freedoms Foundation" pursuant to carrier authority from Laurie Johnson.	1.20 170.00/hr	204.00
	- PC	Draft and file Notice of Association of Counsel on behalf of Orly Taitz with Federal Court.	0.70 170.00/hr	119.00
	- KS	Conference regarding upcoming Law & Motion [REDACTED]	0.80 170.00/hr	136.00
7/12/2011	- JC	Begin review and analysis of file materials and online materials of Ninth Circuit Court of Appeals regarding pending appeal by insured from denial of anti-SLAPP motion to strike.	0.50 170.00/hr	85.00
	- JC	Begin preparation of mediation statement to Court of Appeals regarding appeal from denial of insured's anti-SLAPP motion as to complaint. Multiple correspondence with client regarding preparation of statement.	0.70 170.00/hr	119.00
	- PC	Draft and file Joinder in Defend Our Freedom Foundation's Motions to dismiss pursuant to 12(b)(1) and 12(b)(6). Pursuant to authority granted by carrier, Laurie Johnson.	0.80 170.00/hr	136.00
	- KS	Conference regarding response by Mr. Taitz.	0.40 170.00/hr	68.00
	- AP	Continue drafting memorandum [REDACTED]	2.80 95.00/hr	266.00
	- KS	Preparation of correspondence to carrier regarding future handling.	0.20 170.00/hr	34.00
	- PC	Continued conferencing with Client throughout the day via telephone regarding case strategy and factual allegations made by Plaintiffs, defense of same.	1.00 170.00/hr	170.00
		[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/12/2011 -	<div style="background-color: black; width: 100px; height: 15px;"></div> <div style="background-color: black; width: 450px; height: 15px;"></div> <div style="background-color: black; width: 450px; height: 15px;"></div> <div style="background-color: black; width: 400px; height: 15px;"></div> <div style="background-color: black; width: 60px; height: 15px;"></div>	<div style="background-color: black; width: 40px; height: 15px;"></div> <div style="background-color: black; width: 60px; height: 15px;"></div>	<div style="background-color: black; width: 60px; height: 15px;"></div>
- PC	Review and analyze client's original answer and motion to dismiss filed at the outset of this matter in 2009.	2.30 170.00/hr	391.00
- PC	Survey of answers and motion to dismiss filed at the outset of this matter in 2009 by the Sankey defendants to original complaint.	1.00 170.00/hr	NO CHARGE
- PC	Begin review of Plaintiff's original 150-page Complaint, filed in Pennsylvania federal court, and compare to operative FAC.	1.00 170.00/hr	170.00
7/13/2011 - PC	Continue review and comparison of Plaintiff's original 150-page Complaint, filed in Pennsylvania federal court, to operative FAC.	2.50 170.00/hr	425.00
- KS	Correspondence from carrier regarding waiver and First Amended Complaint.	0.60 170.00/hr	102.00
- PC	Review record and proceedings so far in Appeal to client's original Motion to Dismiss under anti-SLAPP. (Appeal authorized by CHUBB.)	0.80 170.00/hr	136.00
- PC	Review client's anti-SLAPP motion as part of analysis necessary for pending appeal. (Appeal authorized by CHUBB.)	2.20 170.00/hr	374.00
-	<div style="background-color: black; width: 400px; height: 15px;"></div> <div style="background-color: black; width: 400px; height: 15px;"></div> <div style="background-color: black; width: 450px; height: 15px;"></div> <div style="background-color: black; width: 250px; height: 15px;"></div>	<div style="background-color: black; width: 40px; height: 15px;"></div> <div style="background-color: black; width: 60px; height: 15px;"></div>	<div style="background-color: black; width: 60px; height: 15px;"></div>
- PC	Review Plaintiff's opposition to anti-SLAPP motion as part of analysis necessary for pending appeal. (Appeal authorized by CHUBB.)	1.80 170.00/hr	306.00
- PC	Begin review of Court's order denying anti-SLAPP motion as part of analysis necessary for pending appeal. (Appeal authorized by CHUBB.)	1.00 170.00/hr	170.00
- KM	Analysis of issues regarding 12(b)(6) Motion to dismiss and potential legal theories to properly attack Plaintiff's Complaint.	0.80 170.00/hr	136.00
-	<div style="background-color: black; width: 1000px; height: 15px;"></div> <div style="background-color: black; width: 450px; height: 15px;"></div> <div style="background-color: black; width: 50px; height: 15px;"></div>	<div style="background-color: black; width: 60px; height: 15px;"></div>	
- KS	Conference regarding interlocutory appeal.	0.90 170.00/hr	153.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/13/2011	- KS	Correspondence with carrier regarding authority for appeal.	0.20 170.00/hr	34.00
	- MLC	Receipt and review of all file materials for future handling, including prior pleadings, client correspondence, and carrier correspondence for hard copy and online file set up.	3.10 95.00/hr	294.50
	- KS	Correspondence with carrier regarding authority for Appeal.	0.20 170.00/hr	34.00
	- KS	Conference regarding [REDACTED] [REDACTED]	1.20 170.00/hr	204.00
7/14/2011	- JC	Begin analysis of legal issues and requirements regarding appeal by insured, O. Taitz from denial of anti-SLAPP motion to strike as to complaint, and begin review of voluminous file materials regarding preparation of record of appeal, and toward preparation of insured's opening brief and related documents.	0.90 170.00/hr	153.00
	- [REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED]	[REDACTED]
	- JC	Continue evaluation of complex legal issues [REDACTED] [REDACTED] [REDACTED]	0.90 170.00/hr	153.00
	- [REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED]	[REDACTED]
	- [REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED]	[REDACTED]
	- [REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED]	[REDACTED]
	- JC	Continue preparation of mediation questionnaire in appeal from denial of anti-SLAPP motion to strike regarding complaint.	0.70 170.00/hr	119.00
	- KS	Conference regarding 12e Motion.	0.30 170.00/hr	51.00
	- [REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED]	[REDACTED]
	- [REDACTED]	[REDACTED] [REDACTED]	[REDACTED] [REDACTED]	[REDACTED]

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			Hrs/Rate	Amount
7/14/2011 - JC	Begin evaluation of complex legal issues regarding potential disqualification of plaintiffs' counsel, toward preparation of potential motion to disqualify.		0.80 170.00/hr	136.00
- [REDACTED]	[REDACTED] [REDACTED] [REDACTED]		[REDACTED] [REDACTED]	[REDACTED]
- AP	Research whether federal courts can apply California Civil Procedure Section 1030, or something similar, in diversity jurisdiction cases.		0.60 95.00/hr	57.00
- PC	Draft Mediation Questionnaire responses as required under 9th Circuit scheduling order, including case summary and mediation summary. (Appeal authorized by CHUBB.)		2.00 170.00/hr	340.00
- KM	Review and analyze of Local Rules and Court's specific rules regarding motion filing, discovery, etc.		0.60 170.00/hr	102.00
- KS	Conference regarding authority for Law & Motion.		0.40 170.00/hr	68.00
- CAB	Review and analyze copy of correspondence to clients from Chubb received today for handling regarding retaining Schumann, Rallo & Rosenberg		0.10 95.00/hr	9.50
7/15/2011 - JC	Begin evaluation of statute of limitations defenses regarding amended complaint, toward preparation of motions to dismiss and strike for insureds.		0.80 170.00/hr	136.00
- JC	Begin evaluation of legal issues regarding consolidation or joinder of insureds' appeals from denial of "anti-SLAPP" motion to strike regarding complaint.		0.70 170.00/hr	119.00
- [REDACTED]	[REDACTED] [REDACTED] [REDACTED] [REDACTED]		[REDACTED] [REDACTED]	[REDACTED]
- DL	Begin evaluation of legal issues regarding standing requirements of fictitious business entities toward motions to strike.		0.80 95.00/hr	76.00
- AP	Continue review of whether federal courts [REDACTED] [REDACTED]		3.10 95.00/hr	294.50
- KS	Authority from carrier.		0.10 170.00/hr	17.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/15/2011	- JC	Begin meet and confer and preparation of lengthy related correspondence regarding motions to dismiss and strike amended complaint by defendants, Law Offices of Orly Taitz and Orly Taitz, Inc.	1.10 170.00/hr	187.00
	- AP	Draft memorandum [REDACTED] [REDACTED]	2.80 95.00/hr	266.00
	- AP	Review whether and [REDACTED] [REDACTED] [REDACTED]	0.80 95.00/hr	76.00
	- DW	Finalize correspondence to opposing counsel regarding meet and confer	0.10 95.00/hr	9.50
	- [REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED]	[REDACTED]
	- PC	Review response from Plaintiffs regarding dismissal of Taitz.	0.50 170.00/hr	85.00
	- [REDACTED]	[REDACTED] [REDACTED]	[REDACTED] [REDACTED]	[REDACTED]
	- JC	Multiple correspondence with insureds toward preparation of several motions to dismiss, to strike and for more definite statement as to amended complaint, including toward gathering necessary information and evidence to prepare motions.	1.60 170.00/hr	272.00
	- KS	Conference with carrier regarding status and future handling.	0.60 170.00/hr	102.00
	- KS	Correspondence with carrier regarding representation of client.	0.40 170.00/hr	68.00
	- JC	Begin evaluation of complex legal issues regarding potential motions for a more definite statement by insureds as to amended complaint.	1.40 170.00/hr	238.00
	- JC	Continue evaluation of complex legal issues regarding legal standing of various plaintiffs and defendants, toward preparation of motions to dismiss and to strike for insureds.	0.90 170.00/hr	153.00
7/16/2011	- [REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED] [REDACTED]	[REDACTED]
7/17/2011	- JC	Begin review and analysis of claims of plaintiff, Go Excel Global towards preparation of insured's motions to strike and to dismiss Go Excel Global's claims.	0.80 170.00/hr	136.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/17/2011	- JC	Begin review and analysis of claims of plaintiff, Law Offices of Philip Berg, towards preparation of insured's motions to strike and to dismiss Go Excel Global's claims.	0.90 170.00/hr	153.00
	- KS	Conference regarding client's requests related to court transcript and appeal.	0.40 170.00/hr	68.00
7/18/2011	-	[REDACTED]		
	-	[REDACTED]		
	- MLC	Correspondence to District Court clerk regarding required docket fee.	0.10 95.00/hr	9.50
	-	[REDACTED]		
	- PC	Conference with Jim McCabe, counsel representing defendant Lexis / Reed Elsevier, regarding case status.	0.30 170.00/hr	51.00
	- AP	Review New Jersey law regarding whether dissolved corporations / corporations not in good standing have capacity to bring suit.	4.30 95.00/hr	408.50
	- AP	Draft memorandum regarding whether dissolved corporations / corporations not in good standing have the capacity to sue under New Jersey law.	0.60 95.00/hr	57.00
	- JC	Correspondence with carrier regarding preparation of record on appeal regarding appeal by insured, O. Taitz from denial of anti-SLAPP motion to strike.	0.20 170.00/hr	34.00
	- JC	Review and analysis of various correspondence between insureds and plaintiffs toward evaluation of plaintiffs' amended complaint.	0.40 170.00/hr	68.00
	- PC	Review documents and court orders from prior case involving same clients and same Plaintiffs regarding sanctions of Berg, counsel for Plaintiffs, as submitted by client.	0.80 170.00/hr	136.00
	- PC	Review email communications between Orly Taitz and Plaintiffs prior to lawsuit filing, provided by client.	0.30 170.00/hr	51.00
	-	[REDACTED]		



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		<u>Hrs/Rate</u>	<u>Amount</u>
7/18/2011	- [REDACTED]		
	- [REDACTED]		
	- [REDACTED]		
	- [REDACTED]		
	- [REDACTED]		
	- PC Review Plaintiffs' original motion for leave to file FAC.	1.80 170.00/hr	306.00
	- PC Begin review of Plaintiffs' supplement to motion for leave to file FAC (approximately 800 pages and 300 exhibits).	1.50 170.00/hr	255.00
	- PC Review client's opposition to motion for leave to file FAC.	1.20 170.00/hr	204.00
	- PC Review Court's Order granting Plaintiff's motion for leave to file FAC.	1.00 170.00/hr	170.00
	- KS Conference regarding plaintiffs' failure to seek court approval before filing.	0.30 170.00/hr	51.00
	- [REDACTED]		
	- PC Draft and file substantive letter request to Judge (pursuant to court order) seeking leave to filed Motion for Reconsideration on Motion for leave to file FAC.	1.60 170.00/hr	272.00
7/19/2011	- PC Draft declarations and exhibits supporting Motion to Dismiss pursuant to carrier authority from Laurie Johnson.	0.70 170.00/hr	119.00
	- PC Draft Request for Judicial Notice and exhibits supporting Motion to Dismiss pursuant to carrier authority from Laurie Johnson.	0.40 170.00/hr	68.00
	- KS Analyze possible undertaking by plaintiffs.	0.60 170.00/hr	102.00
	- KS Telephone call with client regarding Law & Motion status.	0.10 170.00/hr	17.00
	- KS Correspondence with carrier regarding authority.	0.10 170.00/hr	17.00
	- [REDACTED]		
	- [REDACTED]		
	- KS Telephone call from client regarding 12(b)(6) and 12(b)(1) Motions.	0.20 170.00/hr	34.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/19/2011	- JC	Multiple telephone conference and correspondence with insured, O. Taitz regarding her and Defend Our Freedom Foundation's appeals from denial of anti-SLAPP motions and consolidation of appeals.	0.60 170.00/hr	102.00
-		[REDACTED]		
-	MLC	Review and revise Notice of Motion and Motion of Defendant, "Law Offices of Orly Taitz", to Dismiss Plaintiff's First Amended Complaint Pursuant to FRCP 12(b)(6), for filing and service pursuant to carrier authority from Laurie Johnson.	0.20 95.00/hr	19.00
-	JC	Multiple telephone conference and correspondence with insureds regarding preparation of motions to dismiss and to strike amended complaint.	0.40 170.00/hr	68.00
-		[REDACTED]		
-	MLC	Review and revise [Proposed] Order Granting Defendants, Orly Taitz's and "Law Offices of Orly Taitz"'s Motion to Dismiss Pursuant to FRCP 12(b)(6), for filing and service pursuant to carrier authority from Laurie Johnson.	0.10 95.00/hr	9.50
-	AP	Continue to review New Jersey law regarding whether a dissolved corporation can bring suit.	2.80 95.00/hr	266.00
-	AP	Revise memorandum regarding whether dissolved corporation can bring suit under New Jersey law.	0.90 95.00/hr	85.50
-	AP	Review possible causes of action [REDACTED]	1.30 95.00/hr	123.50
-		[REDACTED]		
-	PC	Continued conferencing with client regarding status of motion, case status.	0.70 170.00/hr	119.00
-	PC	Continue review of Plaintiffs' supplement to motion for leave to file FAC (approximately 800 pages and 300 exhibits).	2.00 170.00/hr	340.00
-	KS	Telephone call from client regarding Appeal.	0.10 170.00/hr	17.00
-	KS	Conference regarding Appeal.	0.40 170.00/hr	68.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/19/2011	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
7/20/2011 - KS	[REDACTED]	0.20 170.00/hr	34.00
- KS	Authority from carrier.	0.10 170.00/hr	17.00
- KS	Meeting regarding conference with client, conflict of interest claim by opposing counsel, etc.	0.60 170.00/hr	102.00
- KS	Authority from carrier.	0.10 170.00/hr	17.00
- KS	Preparation of correspondence to client regarding plaintiffs new claims and regarding our request for sanctions.	0.10 170.00/hr	17.00
-	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
- JC	Review court of appeal 7/18/11 notice in appeal by insured, O. Taitz from denial of "anti-SLAPP" motion to strike complaint.	0.40 170.00/hr	68.00
- PC	Review Motions to Dismiss filed by the Hale Defendants in the Texas federal companion case, as submitted for review by client.	1.90 170.00/hr	323.00
- PC	Review Motions to Dismiss filed by the Hale Defendants in the Texas federal companion case, as submitted for review by client.	1.90 170.00/hr	323.00
- PC	Review Plaintiff's opposition to Orly's Motion to Stay Case pending appeal in preparation of drafting Reply brief.	2.50 170.00/hr	425.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/20/2011	- PC	Create outline for Reply Brief in support of Motion to Stay case pending appeal.	1.00 170.00/hr	170.00
	- PC	Review Plaintiff's request to file motions to dismiss filings, force withdrawal of law firm.	1.30 170.00/hr	221.00
	- PC	Conference with client regarding Plaintiff's request to file motions to dismiss filings, force withdrawal of law firm.	0.30 170.00/hr	51.00
	- PC	Begin drafting Initial Opinion Letter, drafting of initial outline and begin introductory statements.	1.80 170.00/hr	306.00
7/21/2011	- KS	Conference regarding Motion for Sanctions and Appeal.	0.60 170.00/hr	102.00
	- KS	Conference with carrier regarding status.	0.10 170.00/hr	17.00
	- KM	Review and analysis of file materials to determine relevant facts regarding 12b(6) and 12(f) reply in anticipation of arguments in Plaintiff's Opposition.	0.90 170.00/hr	153.00
	- JC	Continue evaluation of legal issues and authorities for motion to consolidate pending appeals regarding denial of defendants' "anti-SLAPP" motion to strike, toward preparation of such motion.	0.80 170.00/hr	136.00
	- MLC	Prepare Mediation Questionnaire for Orly Taitz Appeal (Case No. 11-56164), for filing and service.	0.20 95.00/hr	19.00
	- JC	Continue preparation of mediation questionnaire of insured O. Taitz in appeal of denial of her "anti-SLAPP" motion to strike.	0.40 170.00/hr	68.00
	- MLC	Review and revise Orly Taitz's Mediation Questionnaire, for filing and service.	0.10 95.00/hr	9.50
	- PC	Continue drafting Initial Opinion Letter.	1.50 170.00/hr	255.00
	- PC	Draft and filed supplemental Mediation Questionnaire, including Proof of Service and list of counsel representing parties.	1.40 170.00/hr	238.00
	- PC	Review prior requests by Plaintiffs seeking three separate TRO's against Orly Taitz.	1.50 170.00/hr	255.00
7/22/2011	- PC	Continued conferencing with Orly Taitz regarding court order as to Defend Our Freedoms Foundation, Law Offices of Orly Taitz, and Orly Taitz, Inc., filing of Motions to Dismiss.	1.00 170.00/hr	170.00
	- JC	Multiple telephone conferences and correspondence with all insureds regarding court declining to consider several motions to dismiss and strike by insureds, and development of strategy toward motion for reconsideration.	1.90 170.00/hr	323.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/22/2011	- [REDACTED] [REDACTED] pursuant to Court Order. [REDACTED]		
- KS	Telephone calls with carrier regarding future handling.	0.40 170.00/hr	68.00
- KS	Telephone call with client regarding future handling and regarding client's personal counsel.	0.40 170.00/hr	68.00
- JC	Continue preparation of reply Memorandum of Points and Authorities regarding defendants' motion to stay case pending appeal.	0.90 170.00/hr	153.00
-	[REDACTED]		
- PC	Continue drafting Reply Brief in support of Motion to Stay proceedings.	2.60 170.00/hr	442.00
- PC	Draft Corrected [REDACTED] [REDACTED]	1.00 170.00/hr	170.00
- PC	Draft declaration [REDACTED] [REDACTED]	0.80 170.00/hr	136.00
- PC	Continued conferencing [REDACTED] [REDACTED]	1.00 170.00/hr	170.00
7/23/2011	- JC Multiple correspondence with clients regarding preparation of motions to dismiss and for judgment on pleadings, and handling of pending appeals and related motion for stay pending appeals.	0.50 170.00/hr	85.00
- PC	Finalize drafting Reply Brief in support of Motion to Stay proceedings and submit to client for review.	2.50 170.00/hr	425.00
- JC	Continue analysis of legal authorities cited by plaintiffs in opposition to insured's motion to stay pending appeal, and preparation of reply Memorandum of Points and Authorities and supporting documents regarding such opposition.	2.20 170.00/hr	374.00
- KS	Receipt and review of correspondence from carrier regarding representation by other counsel.	0.20 170.00/hr	34.00
- KS	Conference regarding strict local rules and Court's decision to require Law & Motion.	0.50 170.00/hr	85.00
7/24/2011	- PC Review client Orly Taitz's draft Reply Brief from defendant DOFF, suggested revisions to Reply Brief to Motion to Stay Case.	0.90 170.00/hr	153.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/24/2011	- JC	Continue review and analysis of complex legal authorities cited by plaintiffs in opposition to clients' motion to stay case pending appeal, toward preparation of reply Memorandum of Points and Authorities supporting motion.	1.40 170.00/hr	238.00
	- JC	Continue preparation of reply Memorandum of Points and Authorities regarding opposition to clients' motion to stay case pending appeal from denial of anti-SLAPP motion to strike complaint.	1.20 170.00/hr	204.00
	- PC	Review client Orly Taitz's draft Reply Brief from defendant DOFF, suggested revisions to Reply Brief to Motion to Stay Case.	0.90 170.00/hr	153.00
7/25/2011	- KS	Conference regarding filings.	0.40 170.00/hr	68.00
	- PC	Review client's Reply on behalf of Defend Our Freedoms Foundation to Motion to Stay Proceedings on pending appeal.	1.50 170.00/hr	255.00
	- PC	Finalize and file Reply on behalf of Orly Taitz's to Motion to Stay Proceedings on pending appeal.	1.20 170.00/hr	204.00
	- PC	Review Plaintiff's request to judge regarding Corrected Motion filing and request to enter default against certain of Defendants.	1.50 170.00/hr	255.00
	- KS	Telephone call with carrier regarding handling of opposition for Law Offices of Orly Taitz.	0.20 170.00/hr	34.00
	- KS	Correspondence with carrier regarding dismissal of Law Offices of Orly Taitz.	0.10 170.00/hr	17.00
	- JC	Begin review and analysis of proposed reply Memorandum of Points and Authorities for co-defendant, Defend Our Freedoms Foundations, joining in reply Memorandum of Points and Authorities of insured, O. Taitz, regarding her motion to stay case pending appeal.	0.90 170.00/hr	153.00
	- PC	Meeting with Orly Taitz regarding Motion to Stay Proceedings and response to 12(b)(6) motion.	2.20 170.00/hr	374.00
	- JC	Continue preparation of reply Memorandum of Points and Authorities regarding opposition to clients' motion to stay case pending appeal from denial of anti-SLAPP motion to strike complaint.	2.10 170.00/hr	357.00
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/25/2011	- MLC	Finalize Reply Brief by Orly Taitz, in Support of Motion to Stay Proceedings Pending Appeal, for filing and service.	0.30 95.00/hr	28.50
	- PC	Review Plaintiffs Memorandum of Points and Authorities in opposition to Motion to Dismiss in preparation of drafting Reply Brief.	1.50 170.00/hr	255.00
	- PC	Review Declaration of Andrew Lincoln submitted by Plaintiffs in support of opposition to Motion to Dismiss.	0.90 170.00/hr	153.00
	- JC	Continue review and analysis of complex legal authorities cited by plaintiffs in opposition to clients' motion to stay case pending appeal, toward preparation of reply Memorandum of Points and Authorities supporting motion.	1.30 170.00/hr	221.00
	- JC	Multiple correspondence with insureds toward preparation of reply Memorandum of Points and Authorities regarding their motion to stay case pending appeal.	0.50 170.00/hr	85.00
	- PC	Review 20 page Declaration of Lisa Ostella submitted by Plaintiffs in support of opposition to Motion to Dismiss, and exhibits attached therein.	1.80 170.00/hr	306.00
	- PC	Begin review 24 page Declaration of Lisa Liberi submitted by Plaintiffs in support of opposition to Motion to Dismiss, including review of 26 exhibits (270 pages) attached therein.	2.00 170.00/hr	340.00
	- JC	Review and analysis of opposing counsel's 7/25/11 correspondence to court regarding striking insured O. Taitz's motion for stay pending appeal, and insured's responsive letter, toward preparation of insured's reply Memorandum of Points and Authorities regarding such motion.	0.40 170.00/hr	68.00
	-	[REDACTED]		
	- KS	Prepare for meeting with clients.	1.40 170.00/hr	238.00
	- KS	Telephone call with client regarding future handling.	0.40 170.00/hr	68.00
	- KS	Evening meeting with clients.	1.10 170.00/hr	187.00
	- KS	Finalize update to carrier regarding future handling.	0.20 170.00/hr	34.00
7/26/2011	- PC	Conference with Plaintiffs' counsel regarding dismissal of extraneous defendants; submit stipulation for signature.	0.50 170.00/hr	85.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
7/26/2011	- KS	Finalize update regarding Law Offices of Orly Taitz.	0.60 170.00/hr	102.00
	- PC	Draft letter request to Judge, pursuant to Court Order, seeking leave to file Stipulated Dismissal of defendants, pursuant to Plaintiff's request.	0.70 170.00/hr	119.00
	-	[REDACTED]		
	- JC	Begin review and evaluation of court's 7/21/11 order on plaintiffs' request for disqualification of SRR as defendant Y. Taitz's counsel, defendant Oracle's request to file motion to dismiss, and insured, O. Taitz's and defendant Defend Our Freedoms' request for reconsideration of granting of plaintiffs' motion to file amended complaint.	0.50 170.00/hr	85.00
	- KS	Correspondence from client regarding opposing counsel's stipulation.	0.10 170.00/hr	17.00
	- JC	Begin evaluation of issues and legal authorities cited in plaintiffs' opposition to insured, O. Taitz's motion to dismiss amended complaint, toward preparation of reply Memorandum of Points and Authorities.	0.60 170.00/hr	102.00
	- JC	Begin evaluation of legal issues regarding potential conversion by court of insured, O. Taitz's motion to dismiss amended complaint to motion for summary judgment, and begin development of arguments against conversion, toward preparation of reply Memorandum of Points and Authorities.	0.40 170.00/hr	68.00
	- PC	Continue review of case file in preparing Initial Letter and litigation plan, review Court's Order denying TRO's filed by Plaintiffs.	2.00 170.00/hr	340.00
	- PC	Continue review of documents submitted by Plaintiffs as part of proposed First Amended Complaint (approximately 300 exhibits) in continuing case analysis.	3.60 170.00/hr	612.00
	- JC	Continue evaluation of legal issues regarding dismissal of non-existent entity, defendant Law Offices of O. Taitz, including regarding proposed stipulation and order dismissing defendant.	0.30 170.00/hr	51.00
	- PC	Continue review of Plaintiffs Memorandum of Points and Authorities in opposition to Motion to Dismiss in preparation of drafting Reply Brief.	1.80 170.00/hr	306.00
	- KS	Correspondence with client regarding opposing counsel's agreement.	0.10 170.00/hr	17.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/26/2011	- MLC	Review 9th Circuit Court of Appeals rules regarding designating the record on appeal.	0.90 95.00/hr	85.50
	- KS	Correspondence from carrier regarding waiver.	0.10 170.00/hr	17.00
	- PC	Begin review of 3rd Circuit appeal documents regarding Petition by client on Motion to Dismiss under 12(b)(1), including 3rd Circuit court opinion.	1.50 170.00/hr	255.00
	-	[REDACTED]		
	- JC	Multiple correspondence with opposing counsel regarding preparation of stipulation to dismiss defendant Law Offices of O. Taitz.	0.30 170.00/hr	51.00
	- JC	Begin review of voluminous file materials regarding preparation of record on appeal in appeal by insured, O. Taitz from denial of anti-SLAPP motion to strike as to complaint.	0.80 170.00/hr	136.00
	- KS	Receipt of large claims file material; begin analysis thereof.	1.80 170.00/hr	306.00
	- KS	Correspondence with client regarding filing of stipulation to dismiss Law Offices of Orly Taitz.	0.20 170.00/hr	34.00
	- KS	Conference regarding future handling after yesterday's meetings with clients and clients new directions.	0.80 170.00/hr	136.00
	- KS	Correspondence with carrier regarding Law Offices of Orly Taitz.	0.20 170.00/hr	34.00
7/27/2011	- JC	Begin preparation of opening brief of insured, O. Taitz in appeal from denial of her anti-SLAPP motion to strike complaint.	0.50 170.00/hr	85.00
	- AP	Review Exhibits used in Plaintiff's First Amended Complaint, and prepare spreadsheet with pertinent data including exhibit number, docket number, date, description and other relevant information.	6.30 95.00/hr	598.50
	- KS	Receipt and review of filing from Defend Our Freedoms Foundation regarding stipulation.	0.20 170.00/hr	34.00
	- PC	Review three separate Answers filed by Sankey Defendants (Sankey Investigations, Neil Sankey, Todd Sankey).	2.50 170.00/hr	425.00
	- JC	Continue review of voluminous file materials regarding insured, O. Taitz's anti-SLAPP motion to strike, toward preparation of record on appeal in appeal from order denying motion.	1.40 170.00/hr	238.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
7/27/2011 -	[REDACTED]	[REDACTED]	
- PC	Conference with client regarding changes to draft of answer to FAC.	0.40 170.00/hr	68.00
- PC	Continue drafting reply brief in support of Orly's 12(b)(6) Motion to dismiss.	1.60 170.00/hr	272.00
-	[REDACTED]	[REDACTED]	
- JC	Begin review and analysis of insured, O. Taitz's anti-SLAPP motion to strike and voluminous supporting documents, toward preparation of insured's opening brief in appeal from denial of motion.	1.60 170.00/hr	272.00
- JC	Multiple correspondence with insureds regarding preparation of stipulation to dismiss defendant, Law Offices of Orly Taitz, and submittal of required request for leave to enter dismissal.	0.40 170.00/hr	68.00
- JC	Begin review and analysis of voluminous pleadings of plaintiff, P. Berg, in several prior freedom of speech cases, toward potential inclusion of such materials in record on appeal supporting insured, O. Taitz's appeal from denial of her anti-SLAPP motion to strike complaint.	0.80 170.00/hr	136.00
- JC	Receipt and review of notices of various electronic filings, including regarding answer and initial discovery, by Sankey Defendants.	0.50 170.00/hr	85.00
-	[REDACTED]	[REDACTED]	
- PC	Begin drafting Objection to Declaration of Liberi in support of Plaintiff's opposition to 12(b)(6) motion pursuant to carrier authority from Laurie Johnson.	1.20 170.00/hr	204.00
- PC	Begin drafting Objection to Declaration of Ostella in support of Plaintiff's opposition to 12(b)(6) motion pursuant to carrier authority from Laurie Johnson.	1.00 170.00/hr	170.00
- PC	Begin drafting Objection to Declaration of Lincoln in support of Plaintiff's opposition to 12(b)(6) motion pursuant to carrier authority from Laurie Johnson.	1.00 170.00/hr	170.00
- PC	Continue drafting Initial Letter, detailed factual background to litigation section.	1.50 170.00/hr	255.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/28/2011	- KS	Correspondence with client regarding opposing counsel's offer to dismiss.	0.10 170.00/hr	17.00
	- JC	Review multiple correspondence from defendants, Defend Our Freedom Foundation and Orly Taitz, Inc. to court, regarding leave to file motions to dismiss.	0.40 170.00/hr	68.00
	- AP	Review exhibits used in Plaintiff's Opposition to Motion to Dismiss, and prepare spreadsheet with pertinent data including exhibit number, docket number, date, description and other relevant information.	1.60 95.00/hr	152.00
	- PC	Begin review of [REDACTED]	0.50 170.00/hr	85.00
	- PC	Review and analyze [REDACTED]	0.70 170.00/hr	119.00
	- AP	Review exhibits used in Defendant's Anti-SLAPP motion, and prepare spreadsheet with pertinent data including exhibit number, docket number, date, description and other relevant information.	0.80 95.00/hr	76.00
	- PC	Begin review of cases [REDACTED]	1.60 170.00/hr	272.00
	- AP	Continue reviewing exhibits used in Plaintiff's First Amended Complaint, preparing a spreadsheet with pertinent data including exhibit number, docket number, date, description and other relevant information.	2.60 95.00/hr	247.00
	- PC	Begin review of cases [REDACTED]	1.80 170.00/hr	306.00
	- PC	Continue initial draft of Reply Brief in Support of Motion to Dismiss.	2.00 170.00/hr	340.00
	- JC	Continue evaluation of legal issues and requirements regarding preparation of motion to consolidate appeals of insured, O. Taitz and defendant, Defend Our Freedoms Foundation, from denial of anti-SLAPP motion to strike complaint.	0.80 170.00/hr	136.00
	- JC	Receipt and review order extending time for various defendants to respond to amended complaint.	0.20 170.00/hr	34.00
	- KS	Correspondence with client regarding Motion to Dismiss.	0.30 170.00/hr	51.00
	-	[REDACTED]		

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			<u>Hrs/Rate</u>	<u>Amount</u>
		incorporation of insured's proposed revisions to factual denials of numerous allegations.		
7/28/2011	- KS	Conference regarding court ruling and handling based on authority.	0.40 170.00/hr	68.00
	- KS	Correspondence with client regarding handling of Motion to Dismiss.	0.20 170.00/hr	34.00
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
	- JC	Begin review and analysis of court's 7/28/11 order allowing insured, Y. Taitz to file motions to dismiss and to strike amended complaint, and denying insured, O. Taitz's requests to file such motions.	0.30 170.00/hr	51.00
	- JC	Multiple correspondence with insured, Y. Taitz regarding court's 7/28/11 order allowing insured to file motions to dismiss and to strike amended complaint, and denying insured, O. Taitz's requests to file such motions.	0.30 170.00/hr	51.00
	- PC	Begin review of [REDACTED]	0.60 170.00/hr	102.00
	- PC	Review Court Order granting leave to file 12(b)(6) and 12(f) motions, denying Plaintiff's requests, also denying Orly's requests on behalf of clients she represents (DOFF, LOOT).	1.80 170.00/hr	306.00
	- PC	Continue review and analysis of [REDACTED]	2.00 170.00/hr	340.00
		[REDACTED]		
		[REDACTED]		
7/29/2011	- JC	Multiple correspondence with insureds regarding preparation for upcoming hearing on various motions to dismiss, and insured, O. Taitz's request to Court for clarification of order denying leave to file additional dispositive motions.	0.40 170.00/hr	68.00
	- JC	Continue evaluation of legal issues and requirements regarding preparation of motion to consolidate appeals of insured, O. Taitz and defendant, Defend Our Freedoms Foundation, from denial of anti-SLAPP motion to strike complaint.	0.30 170.00/hr	51.00
	- MLC	Review and revise Orly Taitz's Motion to Consolidate Appeals, pursuant to Jeff Cunningham's request.	0.40 95.00/hr	38.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/29/2011	- PC	Review Defendant Intelius's request to file Motion to Dismiss.	0.20 170.00/hr	34.00
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
	- JC	Begin preparation of motion to consolidate appeals of insured, O. Taitz and defendant, Defend Our Freedoms Foundation, from denial of anti-SLAPP motion to strike complaint.	2.20 170.00/hr	374.00
	- PC	Continue drafting Objection to Declaration of Liberi in support of Plaintiff's opposition to 12(b)(6) motion pursuant to carrier authority from Laurie Johnson.	0.50 170.00/hr	85.00
	- PC	Continue drafting Objection to Declaration of Lincoln in support of Plaintiff's opposition to 12(b)(6) motion pursuant to carrier authority from Laurie Johnson.	1.00 170.00/hr	170.00
	- PC	Continued to detailed review of correspondence between client and Plaintiffs regarding allegations in FAC, approximately 100 pages and part of 800 pages of exhibits submitted as part of Proposed FAC.	2.50 170.00/hr	425.00
8/1/2011	- JC	Continue evaluation of complex legal authorities regarding insured, O. Taitz's anti-SLAPP motion to strike, toward preparation of her opening brief in appeal from denial of anti-SLAPP motion to strike.	0.80 170.00/hr	136.00
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
	-	[REDACTED]		
		[REDACTED]		

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/1/2011	- MH	Begin fact investigation and analysis of [REDACTED] [REDACTED] [REDACTED] [REDACTED]	2.20 170.00/hr	374.00
-		[REDACTED] [REDACTED] [REDACTED]		
-		[REDACTED] [REDACTED] [REDACTED]		
-	PC	Finalize reply brief regarding motion to dismiss	2.50 170.00/hr	425.00
-	PC	Continue drafting objections to declarations in opposition to motion to dismiss pursuant to carrier authority from Laurie Johnson.	0.50 170.00/hr	85.00
-	PC	Continue comparison between plaintiffs original complaint with the FAC	2.00 170.00/hr	340.00
-	PC	Finalize letter request to judge re stipulated dismissal of defendants	0.20 170.00/hr	34.00
-		[REDACTED] [REDACTED]		
-		[REDACTED] [REDACTED] [REDACTED] [REDACTED]		
-	MLC	Review and revise Defendant Orly Taitz's Reply Brief in Support of Her Motion to Dismiss Pursuant to FRCP 12(b)(6), for filing and service.	0.20 95.00/hr	19.00
-		[REDACTED] [REDACTED] [REDACTED] [REDACTED]		
-		[REDACTED] [REDACTED] [REDACTED] and service.		
-		[REDACTED] [REDACTED] [REDACTED]		

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/1/2011	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
	-	[REDACTED]		
		[REDACTED]		
	-	[REDACTED]		
		[REDACTED]		
8/2/2011	- MH	Continue fact investigation and analysis [REDACTED]	0.70	119.00
		[REDACTED]	170.00/hr	
		[REDACTED]		
	- JC	Continue preparation of lengthy memorandum of evidentiary objections to plaintiffs' three, lengthy (greater than 60 pages plus 200 pages of exhibits) declarations in opposition to motion of insured, O. Taitz, to dismiss amended complaint, and toward preparation of reply to such opposition.	0.90	153.00
			170.00/hr	
	- JC	Review court's 8/2/11 notice of continuance of several motions to dismiss and to stay to 8/22/11, to be heard with other dispositive motions.	0.30	51.00
			170.00/hr	
	- JC	Begin review of State Bar disciplinary record regarding declarant, C. Lincoln, toward preparation of evidentiary objections to his declaration submitted by plaintiffs in opposition to insured, O. Taitz's motion to dismiss amended complaint.	0.60	102.00
			170.00/hr	
	- JC	Continue evaluation of legal authorities regarding admissibility of extrinsic evidence on motion of insured, O. Taitz, to dismiss amended complaint, and Federal Rules of Evidence and related authority, toward preparation of memoranda of evidentiary objections to lengthy (60 pages plus 200 pages of exhibits) declarations and exhibits.	1.10	187.00
			170.00/hr	
	- MLC	Review Federal Rules of Civil Procedure and Local Rules regarding filing our Objections in Support of our Reply to Plaintiff's Opposition to Orly Taitz's Motion to Dismiss.	0.60	57.00
			95.00/hr	
	- BM	Analyze federal statutory and decisional authority regarding evidentiary objections and due process considerations regarding same	1.40	238.00
			170.00/hr	
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
	- JC	Continue review and analysis of plaintiffs' three lengthy (60 pages plus 200 pages of exhibits) declarations and exhibits in opposition to insured, O. Taitz's motion to dismiss amended	1.40	238.00
			170.00/hr	



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			<u>Hrs/Rate</u>	<u>Amount</u>
		complaint, toward preparation of memoranda of evidentiary objections to such declarations and exhibits.		
8/2/2011	- KS	Correspondence with carrier regarding update and budget.	0.20 170.00/hr	34.00
	- PC	Phone conference with client regarding case status; court order and future judicial requests.	0.50 170.00/hr	85.00
	- KS	Conference regarding [REDACTED] [REDACTED] [REDACTED]	0.40 170.00/hr	68.00
	- KS	Conference regarding client's concerns related to August hearing date.	0.30 170.00/hr	51.00
	- MLC	Multiple conferences with Jeffrey Cunningham regarding our evidentiary objections to plaintiff's declarations supporting his opposition to Orly Taitz's Motion to Dismiss.	0.70 95.00/hr	NO CHARGE
8/3/2011	- KS	Conference regarding discovery plan and production of documents.	0.30 170.00/hr	51.00
	- PC	Review and analyze Plaintiffs' Rule 26 Report and supporting declaration.	1.50 170.00/hr	255.00
	- PC	Conference with Sankey defendant regarding 12(b)(6) motion, potential motion to dismiss, evidence in support.	0.30 170.00/hr	51.00
	- PC	Conference with client regarding request of Defendant Orly Taitz stipulated dismissal of unnecessary defendants.	0.50 170.00/hr	85.00
	- JC	Multiple correspondence with insured, O. Taitz, regarding stipulation for dismissal of defendant Law Offices of O. Taitz.	0.30 170.00/hr	51.00
	- AP	Draft the quotations section of the Evidentiary Objections by Defendant, Orly Taitz, to the Declaration of Lisa Liberi filed by Plaintiff's with their Opposition to Defendant's Motion to Dismiss.	3.80 95.00/hr	361.00
	- MH	Begin preparing analysis of [REDACTED] [REDACTED] [REDACTED] [REDACTED]	2.40 170.00/hr	408.00
	-	[REDACTED] [REDACTED] [REDACTED] [REDACTED]		
	- JC	Continue preparation of lengthy memorandum of evidentiary objections to plaintiffs' three, lengthy (greater than 60 pages plus 200 pages of exhibits) declarations in opposition to motion of	1.50 170.00/hr	255.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	insured, O. Taitz, to dismiss amended complaint, and toward preparation of reply to such opposition.		
8/3/2011 - JC	Continue review and analysis of plaintiffs' three lengthy (60 pages plus 200 pages of exhibits) declarations and exhibits in opposition to insured, O. Taitz's motion to dismiss amended complaint, toward preparation of memoranda of evidentiary objections to such declarations and exhibits.	1.50 170.00/hr	255.00
- KS	Preparation of memorandum regarding conference with clients.	1.00 170.00/hr	170.00
8/4/2011 - JC	Continue preparation of lengthy memorandum of evidentiary objections to plaintiffs' three, lengthy (greater than 60 pages plus 200 pages of exhibits) declarations in opposition to motion of insured, O. Taitz, to dismiss amended complaint, and toward preparation of reply to such opposition.	2.60 170.00/hr	442.00
- JC	Begin review and evaluation of plaintiffs' lengthy opposition documents to insured, O. Taitz's anti-SLAPP motion to strike complaint, toward preparation of opening brief and record on appeal in insured's appeal from denial of motion.	3.10 170.00/hr	527.00
- PC	Conference with Mike Niborski, counsel representing Daylight Chemicals, regarding case status.	0.50 170.00/hr	85.00
-			
- AP	Continue drafting the quotations section to the Evidentiary Objections by Defendant, Orly Taitz, to the Declaration by Lisa Liberi filed by Plaintiffs with their Opposition to Defendant's Motion to Dismiss.	0.90 95.00/hr	85.50
- AP	Research whether there is a limit to the amount of Requests for Admissions and Interrogatories that can be propounded to the opposing side in federal court and whether there is a limit to the length/amount of Depositions that can be taken in federal court.	0.20 95.00/hr	19.00
- AP	Review method for being able to exceed limit of Interrogatories or Depositions normally allowed in Federal Court.	0.90 95.00/hr	85.50
- AP	Begin drafting the quotations section to the Evidentiary Objections by Defendant, Orly Taitz, to the Declaration by Lisa Ostella, filed by Plaintiffs with their Opposition to Defendant's Motion to Dismiss.	0.50 95.00/hr	47.50
- PC	Analysis of allegations in verified documents submitted by plaintiffs in preparation of drafting written discovery requests	2.50 170.00/hr	425.00
- MH	Continue preparing analysis of additional matters of liability and/or potential other matters of potential liability for purposes of preparing update letter to carrier; continue preparing summary of	3.20 170.00/hr	544.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	extensive and detailed bar complaint against client, prepare summary of allegations of Lucas Smith, prepare summary of alleged affair with legal assistant		
8/5/2011 -	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
-	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
-	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
- AP	Continue drafting quotations section to the Evidentiary Objections by Defendant, Orly Taitz, to the Declaration of Lisa Ostella, filed by Plaintiffs with their Opposition to Defendant's Motion to Dismiss.	2.70 95.00/hr	256.50
- AP	Draft quotations section to the Evidentiary objections by Defendant, Orly Taitz, to the Declaration of Charles Edward Lincoln, filed by Plaintiffs with their Opposition to Defendant's Motion to Dismiss.	0.80 95.00/hr	76.00
- AP	Draft objections section to Evidentiary Objections by Defendant, Orly Taitz, to the Declaration of Lisa Ostella, filed by Plaintiff's Opposition to Defendant's Motion to Dismiss.	2.90 95.00/hr	275.50
- PC	Begin drafting status update	1.50 170.00/hr	255.00
- PC	Continue drafting detailed litigation budget and analysis	2.00 170.00/hr	340.00
-	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
-	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
8/8/2011 -	[REDACTED]		
	[REDACTED]		
	[REDACTED]		

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			<u>Hrs/Rate</u>	<u>Amount</u>
		[REDACTED]		
8/8/2011	- JC	Continue preparation of lengthy (over 100 pages) evidentiary objections to plaintiffs' three lengthy declaration with voluminous exhibits, toward preparation of insured, O. Taitz's reply to plaintiffs' opposition to her motion to dismiss amended complaint.	1.10 170.00/hr	187.00
	- PC	Continue drafting 105 page evidentiary objections to declarations and evidence submitted by plaintiffs in support of opposition to Motion to Dismiss pursuant to carrier authority from Laurie Johnson.	1.50 170.00/hr	255.00
	- PC	Review defendant Oracle Corporation's motion to dismiss first amended complaint pursuant to carrier authority from Laurie Johnson.	1.00 170.00/hr	170.00
	- MLC	Revise and finalize Evidentiary Objections by Defendant, Orly Taitz, to Declarations filed by Plaintiffs with their Opposition to Defendant's Motion to Dismiss Pursuant to FRCP 12(b)(6) and Supporting Declaration, for filing and service (Motion is approximately 106 pages)	3.10 95.00/hr	294.50
	- KS	Conference regarding objections to opposing counsel's filings.	0.40 170.00/hr	68.00
	-	[REDACTED]		
	-	[REDACTED]		
8/9/2011	-	[REDACTED]		
	- JC	Multiple correspondence with plaintiffs' counsel and court regarding insured, O. Taitz's memorandum of evidentiary objections to plaintiffs' declarations in opposition to insured's motion to dismiss, and plaintiffs' request for leave to file response to evidentiary objections.	0.40 170.00/hr	68.00
	-	[REDACTED]		
	- PC	Begin review of Claims file documents.	2.50 170.00/hr	425.00
	-	[REDACTED]		

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/9/2011	- PC	Review Daylight Chemicals stipulation and related court order regarding motion filing date.	0.30 170.00/hr	51.00
	- PC	Continue draft of litigation budget and analysis	1.00 170.00/hr	170.00
	-	[REDACTED]		
	- PC	Review Berg's request to file a response to Orly Taitz's evidentiary objections to the declarations filed on behalf of Plaintiffs in opposition to Orly Taitz's Motion to Dismiss.	0.50 170.00/hr	85.00
	- KS	Conference regarding future handling.	0.40 170.00/hr	68.00
	- KS	Finalize correspondence to carrier.	0.80 170.00/hr	136.00
	- KS	Conference regarding strategy related to opposing counsel's objections.	0.40 170.00/hr	68.00
	- KS	Correspondence with carrier regarding budget.	0.10 170.00/hr	17.00
	- KS	Conference regarding possible Cross-Complaints.	0.30 170.00/hr	51.00
	- PC	Continued conferencing with client, Orly Taitz, regarding status of defendants, including default requests against Orly Taitz, Inc. and Yosef Taitz, and involving motion-related issues.	1.00 170.00/hr	170.00
	- AP	Begin drafting Requests for Admission, Set One, to be propounded on Plaintiff, Philip J Berg.	1.20 95.00/hr	114.00
	- KS	Correspondence from client with update regarding her claims.	0.20 170.00/hr	34.00
	- JC	Multiple correspondence with plaintiffs' counsel and court regarding plaintiffs' request for leave to enter defaults of Orly Taitz, Inc. and insured, Y. Taitz in capacity as CEO of defendant Daylight Systems, and requests for insured, O. Taitz for leave to file responsive motions to dismiss.	0.40 170.00/hr	68.00
8/10/2011	- KS	Conference regarding opposing counsel's push to take default of client "in corporate capacity" - something not recognized by law.	0.40 170.00/hr	68.00
	-	[REDACTED]		

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/10/2011	- [REDACTED]		
	- [REDACTED]		
	- [REDACTED]		
	- [REDACTED]		
	- [REDACTED]		
	- [REDACTED]		
	- [REDACTED]		
	- [REDACTED]		
	- AP Continue drafting Requests for Admissions, Set One, to be propounded on Defendant, Philip J. Berg.	1.30 95.00/hr	123.50
	- [REDACTED]		
	- [REDACTED]		
	- [REDACTED]		
	- PC Continue preparation of detailed Initial Opinion Letter, analysis of procedural history initiated in Pennsylvania court, including additional prior Defendants.	2.50 170.00/hr	425.00
	- PC Review recent media articles regarding Orly Taitz as related to concurrent lawsuit, in preparation of addressing potential future strategy issues.	1.00 170.00/hr	170.00
	- KS Preparation of correspondence to carrier regarding plaintiff's motion for default.	0.30 170.00/hr	51.00
8/11/2011	- AP Continue drafting Requests for Admission, Set One, to be propounded on Plaintiff, Philip J. Berg by Defendant, Orly Taitz.	1.80 95.00/hr	171.00
	- AP Continue drafting Requests for Admission, Set One, to be propounded on Plaintiff, Lisa Liberi, by Defendant, Orly Taitz.	1.80 95.00/hr	171.00
	- AP Continue drafting Requests for Admission, Set One, to be propounded on Plaintiff, Lisa Ostella, by Defendant, Orly Taitz.	1.80 95.00/hr	171.00
8/12/2011	- KS Conference regarding vexatious litigants.	0.40 170.00/hr	68.00
	- AP Continue drafting Requests for Production, Set One, to be propounded on Plaintiff, Philip J. Berg, by Defendant, Orly Taitz.	1.80 95.00/hr	171.00
	- AP Continue drafting Requests for Production, Set One, to be propounded on Plaintiff, Lisa Liberi, by Defendant, Orly Taitz.	2.30 95.00/hr	218.50
	- AP Continue drafting Requests for Production, Set One, to be propounded on Plaintiff, Lisa Ostella, by Defendant, Orly Taitz.	1.80 95.00/hr	171.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/12/2011	- AP	Research whether certain Res Ipsa Loquitur cases involved accidents and if so, what kinds, and what causes of action were pled.	0.60 95.00/hr	57.00
	-	[REDACTED]		
	- KS	Preparation of correspondence to carrier regarding Minute Order.	0.20 170.00/hr	34.00
	- PC	Review Court Order providing authorization to file motions pursuant to various requests from parties, including requests submitted by Orly Taitz, Philip Berg and Intelius.	0.40 170.00/hr	68.00
	-	[REDACTED]		
	-	[REDACTED]		
	- KS	Conference regarding oral arguments.	0.60 170.00/hr	102.00
	- KS	Telephone call with carrier regarding status.	0.10 170.00/hr	17.00
8/13/2011	- KS	Telephone call from client regarding demand to dismiss.	0.10 170.00/hr	17.00
	- KS	Conference regarding Court's Order denying opposing counsel's request.	0.20 170.00/hr	34.00
	- KS	Correspondence with client regarding call to opposing counsel.	0.10 170.00/hr	17.00
8/14/2011	-	[REDACTED]		
	- JC	Multiple correspondence with client, O. Taitz regarding court's order for parties to submit reports regarding prior litigation and sanctions, regarding potential designation of parties as vexatious litigants.	0.40 170.00/hr	68.00
	- PC	Review Plaintiff's opposition to Motion to Strike in preparation for assessing strategy and further development of discovery plan.	1.00 170.00/hr	170.00
8/15/2011	-	[REDACTED]		

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/15/2011	- JC	Review Notice of Electronic Filing regarding Intelius Defendants' stipulation for extension to respond to amended complaint.	0.20 170.00/hr	34.00
	- JC	Begin review and analysis of insured, O. Taitz's proposed seven page report to court [REDACTED] [REDACTED] [REDACTED]	0.30 170.00/hr	51.00
	-	[REDACTED] [REDACTED] [REDACTED]		
	-	[REDACTED] [REDACTED] [REDACTED]		
	-	[REDACTED] [REDACTED] [REDACTED]		
	-	[REDACTED] [REDACTED] [REDACTED]		
	- AP	Continue drafting Requests for Admission, Set One, to be propounded on Plaintiff, Philip J. Berg, by Defendant, Orly Taitz.	1.10 95.00/hr	104.50
	- AP	Continue drafting Requests for Admission, Set One, to be propounded on Plaintiff, Lisa Liberi, by Defendant, Orly Taitz.	0.90 95.00/hr	85.50
	- AP	Continue drafting Requests for Admission, Set One, to be propounded on Plaintiff, Lisa Ostella, by Defendant, Orly Taitz.	0.80 95.00/hr	76.00
	-	[REDACTED] [REDACTED] [REDACTED]		
	-	[REDACTED] [REDACTED] [REDACTED]		
	- JC	Review Reed Elsevier Defendants' request for leave to file motion to dismiss as to Plaintiffs' amended complaint.	0.30 170.00/hr	51.00
	-	[REDACTED] [REDACTED] [REDACTED]		
	-	[REDACTED] [REDACTED] [REDACTED] [REDACTED]		



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		<u>Hrs/Rate</u>	<u>Amount</u>
8/15/2011	- [REDACTED]		
	- [REDACTED]		
	- KS Correspondence from client regarding proposed response to judge.	0.20 170.00/hr	34.00
	- KS Telephone call with client regarding demand to opposing counsel.	0.20 170.00/hr	34.00
8/16/2011	- [REDACTED]		
	- [REDACTED]		
	- PC Begin broad overview of case file and federal docket in related matter of Lincoln v. Daylight Chemical Information Systems, Inc., including cursory review of all filings and court orders, as related to the current matter.	1.50 170.00/hr	255.00
	- PC Review Court Order dated 3/23/11 regarding order on motions to strike, requests for sanction, and order from court requiring permission prior to filing documents and motions applicable to Plaintiff and Orly Taitz.	0.50 170.00/hr	85.00
	- PC Review client's initial and second draft response to Court Order dated 8/12/11 in preparation of client conference and revisions.	1.00 170.00/hr	170.00
	- PC Conference with counsel for Plaintiffs regarding stipulation to dismiss parties / claims.	0.30 170.00/hr	51.00
	- JC Multiple correspondence with client, O. Taitz regarding court's order for parties to submit reports regarding prior litigation and sanctions, [REDACTED], and evaluation of client's proposed second draft of proposed report to court.	0.60 170.00/hr	102.00
	- [REDACTED]		
	- [REDACTED]		
	- JC Review Notice of Electronic Filing, and Lexis Nexis Defendants' stipulation, regarding such defendants' extension to respond to Plaintiffs' amended complaint.	0.30 170.00/hr	51.00
	- MLC Review court docket in Lincoln v. Daylight Chemical and Barnett v. Obama, for relevant court documents pertaining to our current case.	1.10 95.00/hr	104.50
	- [REDACTED]		
	- [REDACTED]		

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			<u>Hrs/Rate</u>	<u>Amount</u>
		[REDACTED]		
		[REDACTED]		
8/16/2011	- AP	Continue drafting Requests for Admission, Set One, to be propounded on Plaintiff, Philip J. Berg, by Defendant, Orly Taitz.	1.60 95.00/hr	152.00
	- AP	Continue drafting Requests for Admission, Set One, to be propounded on Plaintiff, Lisa Liberi, by Defendant, Orly Taitz.	2.20 95.00/hr	209.00
	- AP	Continue drafting Requests for Admission, Set One, to be propounded on Plaintiff, Lisa Ostella, by Defendant, Orly Taitz.	1.40 95.00/hr	133.00
	-	[REDACTED]		
	-	[REDACTED]		
	- PC	Preparation for and telephonic meeting with client to discuss recent court orders, including order regarding authorization to file documents and order to provide litigation history of client.	0.70 170.00/hr	119.00
	- PC	Review stipulation filed by counsel for Lexis Defendants to extend time to file responsive pleadings, and court's order authorizing same.	0.50 170.00/hr	85.00
	-	[REDACTED]		
	- KS	Preparation of correspondence to client regarding proposed response to court.	0.30 170.00/hr	51.00
	- PC	Preparation for and telephonic meeting with counsel for Daylight Chemicals, Steven Silverstein, pursuant to client's instruction, regarding upcoming hearings, pleading status, and recent court orders.	0.50 170.00/hr	85.00
	- PC	Preparation for and meeting with counsel for Lexis, Jim McCabe, regarding upcoming hearings, pleading status, and recent court orders.	0.70 170.00/hr	119.00
	- KS	Conference with client regarding request to dismiss.	0.20 170.00/hr	34.00
	- KS	Telephone call to opposing counsel regarding request to dismiss.	0.10 170.00/hr	17.00
	- KS	Conference regarding demand to opposing counsel to dismiss.	0.20 170.00/hr	34.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/16/2011	- KS Analyze client's proposed response to court order.	0.40 170.00/hr	68.00
8/17/2011	- [REDACTED]		
	- PC Review and analyze client's correspondence requests to court pursuant to the June 14 Court Order.	0.40 170.00/hr	68.00
	- AP Continue drafting Requests for Admission, Set One, to be propounded on Liberi, Ostella, and Berg by Orly Taitz	0.70 95.00/hr	66.50
	- PC Analysis of legal impact of potential motions filed by defendants Defend our Freedoms Foundation and Orly Taitz Inc., and their potential default, to the defense of clients Orly Taitz and Yosef Taitz.	1.00 170.00/hr	170.00
	- [REDACTED]		
	- PC Begin review of factual / legal support in preparation of initial draft of Motion for Undertaking.	1.00 170.00/hr	170.00
	- PC Continue analysis of circumstances and legal aspect of dismissal of related Lincoln v. Daylight matter as related to Liberi matter.	1.00 170.00/hr	170.00
	- JC Review Notice of Electronic Filing, and order on Intelius Defendants' stipulation, regarding such defendants' extension to respond to Plaintiffs' amended complaint.	0.30 170.00/hr	51.00
	- KS Correspondence with client regarding Court's failure to respond to request for leave.	0.20 170.00/hr	34.00
	- AV Preparation of documents to be used in meeting for preparation of motion to stay and motion to dismiss.	0.30 95.00/hr	28.50
	- JC Review multiple correspondence of insured, O. Taitz regarding requests for leave to file motions to dismiss amended complaint by defendants, Defend Our Freedoms and Orly Taitz, Inc.	0.30 170.00/hr	51.00
	- PC Meeting with client regarding case strategy in light of court orders, including two-week plan in terms of motion hearings and filings.	0.70 170.00/hr	119.00
	- MLC Begin summary of Complaint in related case of Charles Edward Lincoln v. Daylight Chemical Corporation, et al. to compare and contrast to the operative complaint in Liberi v. Taitz for purposes of defense strategy.	4.60 95.00/hr	437.00

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		Hrs/Rate	Amount
8/17/2011	MLC Review and analyze 18 U.S.C. et seq., to become familiar with R.I.C.O. (the Racketeer Influenced and Corrupt Organizations Act) for purposes of preparing summary of Complaint for racketeering in related case of Charles Lincoln v. Daylight Chemical, et al.	1.10 95.00/hr	104.50
-	PC Preparation for meeting with client, including review of documents submitted by client such as draft correspondence, motions and web pages.	0.50 170.00/hr	85.00
-	KS Conference regarding [REDACTED]	0.20 170.00/hr	34.00
-	KS Telephone call from client regarding her Court request.	0.20 170.00/hr	34.00
8/18/2011	[REDACTED]		
-	[REDACTED]		
-	[REDACTED]		
-	[REDACTED]		
-	PC Continue review of matter of Lincoln v. Daylight, related case; review and analyze 12(f) motion to strike filed by Orly Taitz / Law Offices of Orly Taitz as related to strategy in defense of client Orly Taitz in present matter.	1.90 170.00/hr	323.00
-	MLC Further prepare and finalize summary of Complaint in related case of Charles Edward Lincoln v. Daylight Chemical Corporation, et al. to compare and contrast to the operative complaint in Liberi v. Taitz for purposes of defense strategy.	1.30 95.00/hr	123.50
-	MLC Telephone call to court clerk to get clarification on Judge Guilford's tentative ruling procedure and whether or not we have to appear at the hearing if the tentative is ruled in our favor.	0.10 95.00/hr	9.50
-	PC Review new opinion of Martin v. Inland Empire regarding changes in law for anti-SLAPP Motions as related to drafting of legal arguments in appellate brief.	0.80 170.00/hr	136.00
-	MLC Begin summary of First Amended Complaint in related case of Charles Edward Lincoln v. Daylight Chemical Corporation, et al. to compare and contrast to the operative complaint in Liberi v. Taitz for purposes of defense strategy.	0.60 95.00/hr	57.00
-	AP Continue drafting Requests for Admission, Set One, to be propounded on Plaintiff, Philip J. Berg, by Defendant, Orly Taitz.	0.20 95.00/hr	19.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/18/2011	- PC	Continue review of matter of Lincoln v. Daylight, related case; review and analyze Plaintiff's "Motion to Strike" the 12(f) and 12(b)(6) Motions by Defendants, in preparation of strategy as to Defendants in present matter.	2.30 170.00/hr	391.00
	- PC	Continue detailed analysis of Plaintiff's 1,000-page compendium of 145 exhibits used in support of their First Amended Complaint; Exhibit 80 to Exhibit 100 / page 700.	2.50 170.00/hr	425.00
	- PC	Continue review of matter of Lincoln v. Daylight, related case; continue analysis of First Amended Complaint as filed by Lincoln and attorney Berg.	0.50 170.00/hr	85.00
	- KS	Conference regarding [REDACTED].	0.10 170.00/hr	17.00
8/19/2011	-	[REDACTED]		
	-	[REDACTED]		
	-	[REDACTED]		
	- AP	Begin drafting Requests for Production of Documents, Set One, to be propounded on Plaintiff, Lisa Liberi, by Defendant, Orly Taitz.	0.30 95.00/hr	28.50
	- AP	Begin drafting Requests for Production of Documents, Set One, to be propounded on Plaintiff, Philip J. Berg, by Defendant, Orly Taitz.	3.40 95.00/hr	323.00
	-	[REDACTED]		
	-	[REDACTED]		
	-	[REDACTED]		
	-	[REDACTED]		
	-	[REDACTED]		
	- MLC	Further prepare and finalize summary of First Amended Complaint in related case of Charles Edward Lincoln v. Daylight Chemical Corporation, et al. to compare and contrast to the operative complaint in Liberi v. Taitz for purposes of defense strategy.	1.90 95.00/hr	180.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/19/2011	- AP	Continue drafting Requests for Admission, Set One, to be propounded on Plaintiff, Lisa Liberi, by Defendant, Orly Taitz.	0.30 95.00/hr	28.50
-		[REDACTED]		
-	PC	Continue review of matter of Lincoln v. Daylight, related case; analysis of First Amended Complaint as filed by Lincoln and attorney Berg as compared to First Amended Complaint in present matter.	2.50 170.00/hr	425.00
-	KS	Conference regarding Motion to Dismiss.	0.20 170.00/hr	34.00
-	PC	Begin broad overview of prior litigation histories of other Plaintiffs, Liberi, Ostella and Berg, with regard to courts order on production of prior litigation history.	1.00 170.00/hr	170.00
-	PC	Analysis of Courts Order regarding the continuation of hearings for Motion to Stay and Motion to Dismiss of Defendant Orly Taitz to later hearing date.	0.50 170.00/hr	85.00
-	PC	Conference with client Orly Taitz regarding case management, courts order, and continued discussions regarding litigation history order by court.	0.70 170.00/hr	119.00
-	KS	Examine news article about insured.	0.40 170.00/hr	68.00
8/20/2011	- KS	Conference regarding client filing.	0.20 170.00/hr	34.00
8/22/2011	- KS	Conference regarding handling of client request.	0.20 170.00/hr	34.00
-	PC	Review Liberi v. West Valley Order regarding: Preliminary Injunction as related to legal strategy.	0.30 170.00/hr	51.00
-	PC	Review Liberi v. West Valley Order regarding: RICO case statement and dismissal for lack of prosecution.	0.30 170.00/hr	51.00
-	PC	Begin review of Liberi v. West Valley RICO complaint.	1.50 170.00/hr	255.00
-	PC	Review Plaintiffs' original Verified Complaint for material discrepancies in preparation of drafting Rule 11 Meet and Confer regarding sanctions and dismissal of defendants.	1.40 170.00/hr	238.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/22/2011	- PC	Review Berg bankruptcy file and legal analysis regarding improper Plaintiff conduct in preparation of drafting Rule 11 Meet and Confer regarding sanctions and dismissal of defendants.	1.50 170.00/hr	255.00
-		[REDACTED]		
-	MLC	Review bankruptcy court docket for information on plaintiff Liberi's 2002 bankruptcy.	0.30 95.00/hr	28.50
-	AP	Continue drafting Requests for Production of Documents, Set One, to be propounded on Plaintiff, Lisa Liberi, by Defendant, Orly Taitz.	2.60 95.00/hr	247.00
-	AP	Continue drafting Requests for Production of Documents, Set One, to be propounded on Plaintiff, Lisa Ostella, by Defendant, Orly Taitz.	2.40 95.00/hr	228.00
-		[REDACTED]		
-	JC	Review insured, O. Taitz's proposed request for leave to file motions to modify vexatious litigant reporting requirement, and to require bond from all plaintiffs.	0.30 170.00/hr	51.00
-	JC	Begin analysis of pending bankruptcy case by Berg plaintiff in preparation to stay cases as to said plaintiff.	0.40 170.00/hr	68.00
-	JC	Begin review of criminal records regarding plaintiff, L. Liberi, toward preparation of Special Interrogatories, Request for Admissions and Request for Production of Documents regarding criminal background.	0.30 170.00/hr	51.00
-	AP	Continue drafting Requests for Production of Documents, Set One, to be propounded on Plaintiff, Philip J. Berg, by Defendant, Orly Taitz.	1.00 95.00/hr	95.00
-		[REDACTED]		
-	JC	Review and analysis of court's 8/19/11 order granting insured, O. Taitz's motion to stay case pending appeal, and ordering insured to report on court of appeal's decision in appeal.	0.30 170.00/hr	51.00
-		[REDACTED]		

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/22/2011	- PC	Review court order granting stay of case as to defendant Orly Taitz.	0.50 170.00/hr	85.00
	- PC	Review court order denying the motion to dismiss filed by Orly Taitz.	0.50 170.00/hr	85.00
	- PC	Review court order granting and denying authority to file motions regarding: Plaintiffs, Reed Defendants, and Orly Taitz.	0.50 170.00/hr	85.00
	- PC	Review proposed letter to court requesting authority to file motions regarding: litigation history order and motion for undertaking.	1.20 170.00/hr	204.00
	- PC	Review matter of Liberi v. West Valley case docket as related to legal strategy in present matter.	1.00 170.00/hr	170.00
	- PC	Correspondence to client regarding: strategy on letter requests to judge regarding: court order on litigation history and [REDACTED]	1.00 170.00/hr	170.00
	- KS	Telephone call from client regarding new filings.	0.20 170.00/hr	34.00
	- PC	Conference with client regarding: court orders issued denying motion to dismiss and granting motion to stay, and ongoing litigation strategy.	0.80 170.00/hr	136.00
	- PC	Review case docket regarding: bankruptcy filings by attorney/plaintiff Phillip Berg.	1.00 170.00/hr	170.00
	- PC	Review bankruptcy discharge filings regarding: Phillip Berg bankruptcy.	0.50 170.00/hr	85.00
8/23/2011	- JC	Begin analysis of complex legal issues regarding insureds' potential recovery of attorney fees and costs, toward preparation of insureds' motion [REDACTED]	0.50 170.00/hr	85.00
	-	[REDACTED]		
	- JC	Review insured, O. Taitz's correspondence to court and related request for leave for defendant, Orly Taitz, Inc. to file motion to dismiss amended complaint.	0.30 170.00/hr	51.00
	- JC	Review insured, O. Taitz's correspondence to court and related request for leave for various defendants, Orly to file motion to require plaintiffs [REDACTED]	0.30 170.00/hr	51.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
8/23/2011	- JC	Continue analysis of legal issues regarding pending bankruptcy of plaintiff, P. Berg, toward preparation of potential dismissal as to P. Berg for lack of standing.	0.60 170.00/hr	102.00
	- JC	Multiple correspondence with insured, O. Taitz, regarding her requests to court to exempt defendant, Orly Taitz, Inc., from stay of case and to allow it to file motion to dismiss, regarding insured's appeal from denial of anti-SLAPP motion.	0.40 170.00/hr	68.00
	- JC	Continue review and analysis of plaintiffs' lengthy opposition to motion to dismiss amended complaint by defendant, Oracle Corporation, including sections regarding insured, Y. Taitz and his company, defendant Daylight Corporation.	1.10 170.00/hr	187.00
	-	[REDACTED]		
	-	[REDACTED]		
	-	[REDACTED]		
	-	[REDACTED]		
	- PC	Review correspondence to court filed by Orly Taitz regarding revision of litigation history court order.	0.70 170.00/hr	119.00
	- PC	Review correspondence to court filed by Orly Taitz regarding modification of court order regarding stay of case as to defendant Orly Taitz Inc.	0.80 170.00/hr	136.00
	- PC	Continue analysis of verified 150 pg complaint filed by Liberi v. West Valley Detention Center	2.20 170.00/hr	374.00
	- PC	Draft and revise declaration of Orly Taitz regarding appellate litigation history for filing related to order to stay case.	1.50 170.00/hr	255.00
	- PC	Begin drafting outline of detailed meet and confer letter demanding dismissal of Orly Taitz pursuant to Rule 11 motion.	1.00 170.00/hr	170.00
	- PC	Continue drafting detailed meet and confer letter demanding dismissal of Orly Taitz pursuant to Rule 11 motion; legal argument regarding Berg bankruptcy standing issue.	1.50 170.00/hr	255.00
	-	[REDACTED]		
	- PC	Correspondence to client regarding draft declaration on order regarding stay of case.	0.50 170.00/hr	85.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/24/2011	- [REDACTED]		
	- [REDACTED]		
- PC	Review appellate case docket and district court case docket pursuant to court order.	0.50 170.00/hr	85.00
- PC	Continue analysis of Liberi's 150-page verified RICO complaint.	1.00 170.00/hr	170.00
-	[REDACTED]		
-	[REDACTED]		
- PC	Continue preparation of detailed Initial Analysis Letter to carrier.	1.00 170.00/hr	170.00
- AP	Continue drafting Requests for Admission, Set One, to be propounded on Plaintiff, Lisa Liberi, by Defendant, Orly Taitz.	0.90 95.00/hr	85.50
- AP	Continue drafting Requests for Admission, Set One, to be propounded on Plaintiff, Lisa Ostella, by Defendant, Orly Taitz.	0.60 95.00/hr	57.00
- AP	Continue drafting Requests for Admission, Set One, to be propounded on Plaintiff, Philip J. Berg, by Defendant, Orly Taitz.	0.50 95.00/hr	47.50
- AP	Continue drafting Requests for Production of Documents, Set One, to be propounded on Plaintiff, Lisa Liberi, by Defendant, Orly Taitz.	0.90 95.00/hr	85.50
- AP	Continue drafting Requests for Production of Documents, Set One, to be propounded on Plaintiff, Lisa Ostella, by Defendant, Orly Taitz.	0.60 95.00/hr	57.00
- AP	Continue drafting Requests for Production of Documents, Set One, to be propounded on Plaintiff, Philip J. Berg, by Defendant, Orly Taitz.	0.50 95.00/hr	47.50
-	[REDACTED]		
-	[REDACTED]		
-	[REDACTED]		

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/24/2011 -	[REDACTED]		
	[REDACTED]		
- JC	Review court's notice and minute order denying request by insured, O. Taitz, to file motion to dismiss for defendant, Orly Taitz, Inc., and clarifying parties to appeal by insured from denial of anti-SLAPP motion.	0.30 170.00/hr	51.00
- PC	Draft litigation update and analysis correspondence to carrier	1.50 170.00/hr	255.00
- PC	Continue drafting detailed meet and confer letter to plaintiffs pursuant to Rule 11	1.20 170.00/hr	204.00
- PC	Continue analysis of discrepancies in Plaintiff's declarations, verified pleadings and transcripts in preparation of drafting Rule 11 meet and confer letter.	0.90 170.00/hr	153.00
- PC	Phone conference with client regarding settlement / dismissal of defendants, potential motions, court order.	0.60 170.00/hr	102.00
- PC	Correspondence to client regarding litigation update, including discussion of motion status & dismissal of defendants, strategy regarding court order.	1.40 170.00/hr	238.00
- KS	Conference regarding client's personal filing.	0.20 170.00/hr	34.00
- PC	Review 8/24/11 court order regarding status of appeal & stay of case.	1.00 170.00/hr	170.00
-	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
-	[REDACTED]		
	[REDACTED]		
-	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of motion to dismiss by related defendant, Law Offices of Orly Taitz.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/24/2011	-	[REDACTED]		
	-	JC Continue preparation of litigation update for carrier, including as to recent decisions on insureds' motions to dismiss and for a stay.	0.40 170.00/hr	68.00
8/25/2011	-	JC Continue review of lengthy docketing entries regarding insured, O. Taitz's appeal from denial of anti-SLAPP motion to strike, toward correction of record on appeal regarding parties to the appeal.	0.40 170.00/hr	68.00
	-	JC Review insured, O. Taitz's correspondence to court and application for leave to file motion to correct docketing entries regarding her appeal from denial of anti-SLAPP motion to strike, toward filing motion by related defendant, Orly Taitz, Inc., to dismiss amended complaint.	0.40 170.00/hr	68.00
	-	JC Telephone conference with clerk of court of appeals regarding request to correct docketing entries regarding insured, O. Taitz's appeal from denial of anti-SLAPP motion to strike.	0.30 170.00/hr	51.00
	-	JC Multiple correspondence with insured, O. Taitz regarding preparation of request to court of appeals to correct docketing entries regarding her appeal from denial of anti-SLAPP motion to strike, and toward filing motion by related defendant, Orly Taitz, Inc., to dismiss amended complaint.	0.30 170.00/hr	51.00
	-	PC Continue drafting detailed Initial Letter to carrier: begin first draft of legal analysis regarding Plaintiff Lisa Liberi's RICO Complaint.	1.80 170.00/hr	306.00
	-	PC Continue drafting detailed Initial Letter to carrier: begin drafting description, including history and news, of Plaintiffs Berg and Law Offices of Berg.	2.20 170.00/hr	374.00
	-	PC Continue drafting detailed Initial Letter to carrier: description of Plaintiff Lisa Ostella, Ostella's relationships with Orly Taitz, Lisa Liberi, and Philip Berg.	2.00 170.00/hr	340.00
	-	PC Review and analyze correspondence from Orly Taitz to Judge Guilford regarding error on docket regarding appeal.	1.00 170.00/hr	170.00
	-	[REDACTED]		
	-	[REDACTED]		
	-	[REDACTED]		

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/26/2011	- JC	Begin preparation of application to Court of Appeals regarding correction of record on appeal regarding non-appellant and defendant, Orly Taitz, Inc.	2.10 170.00/hr	357.00
	- JC	Multiple correspondence with insured, Orly Taitz, regarding preparation of application to Court of Appeals regarding correction of record on appeal regarding non-appellant and defendant, Orly Taitz, Inc. and incorporating insured's additional arguments supporting application.	0.50 170.00/hr	85.00
	- PC	Continue drafting detailed Initial Letter to carrier: continue drafting legal analysis of Plaintiffs RICO Complaint.	1.10 170.00/hr	187.00
	- PC	Continue drafting detailed Initial Letter to carrier: detailed summary of Lincoln v. Daylight related action and Complaint.	1.80 170.00/hr	306.00
	- PC	Continue drafting detailed Initial Letter to carrier: continue legal summary of Plaintiffs Berg and Law Offices of Berg, bankruptcy and bar complaints.	0.60 170.00/hr	102.00
	- PC	Continue drafting detailed Initial Letter to carrier: begin legal description and summary of Plaintiff Lisa Liberi, relationship with Berg and Law Offices of Berg, Orly Taitz and Defend Our Freedoms Foundation.	2.20 170.00/hr	374.00
	- PC	Continue drafting detailed Initial Letter to carrier: continue legal description and summary of Plaintiff Lisa Liberi, focus on criminal history and relation to allegations in complaint.	1.30 170.00/hr	221.00
8/29/2011	-	[REDACTED]		
	- PC	Continue analysis of Plaintiff's 1,000-page compendium of 145 exhibits used in support of their First Amended Complaint.	1.50 170.00/hr	255.00
	- PC	Review reply brief filed by Oracle in preparation of drafting detailed initial analysis letter.	1.00 170.00/hr	170.00
	- PC	Continue drafting detailed Initial Letter to carrier: continue legal description and summary of Plaintiff Lisa Liberi, focus on criminal history and relation to allegations in complaint.	2.30 170.00/hr	391.00
	- PC	Continue drafting detailed Initial Letter to carrier: continue detailed summary of Lincoln v. Daylight related action and Complaint.	1.50 170.00/hr	255.00
	- JC	Receipt and review court's notice of electronic filing of defendant, Oracle Corporation's reply brief regarding its motion to dismiss amended complaint, and begin review and analysis of reply brief.	0.40 170.00/hr	68.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/29/2011	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
8/30/2011	- JC	Continue review and analysis of defendant, Oracle Corporation's reply Memorandum of Points and Authorities regarding its motion to dismiss amended complaint.	0.80 170.00/hr	136.00
	- JC	Review report by plaintiff, P. Berg, regarding potential status as vexatious litigant and previous cases and sanctions orders.	0.40 170.00/hr	68.00
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
	- PC	Draft and revise correspondence to Court regarding 8/12/11 Order as to Defendant, Orly Taitz, in light of 8/19/11 Order staying matter as to Orly Taitz.	1.00 170.00/hr	170.00
	- PC	Continue drafting response to Court's Order regarding Orly Taitz's litigation history, including history of all of Taitz's cases as a litigant.	2.00 170.00/hr	340.00
	- PC	Review and analysis of Taitz v. Astrue matter, dismissal of matter after MSJ, and effects on present matter.	1.00 170.00/hr	170.00
	- JC	Begin evaluation of potential motion for clarification from court of stay affecting insured, O. Taitz and related party, Defend Our Freedoms Foundation, and regarding court-ordered report regarding vexatious litigant status by O. Taitz.	0.30 170.00/hr	51.00
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
8/31/2011	- PC	Continue detailed analysis of Plaintiff's 1,000-page compendium of 145 exhibits used in support of their First Amended Complaint.	2.50 170.00/hr	425.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/31/2011	- PC	Continued conferencing with client regarding letter request for clarification to judge and response to Court Order regarding litigation history.	1.00 170.00/hr	170.00
	- PC	Revisions to responsive pleading to Court Order regarding litigation history, per client instruction.	1.00 170.00/hr	170.00
	- PC	Send email correspondence to Court and all parties regarding letter request for clarification regarding 8/12/11 court order in light of order staying case as to Orly Taitz.	0.50 170.00/hr	85.00
9/1/2011	- PC	Continue analysis of Lincoln v. Daylight matter, specifically reviewing Lincoln / Berg's opposition to Taitz's Anti-SLAPP Motion, toward preparation of initial letter.	1.50 170.00/hr	255.00
	- KS	Begin preparation of carrier update.	1.40 170.00/hr	238.00
	- PC	Continue analysis of Lincoln v. Daylight matter, specifically reviewing the Court's February 2011 Order Granting in Part and Denying in Part Taitz's Anti-SLAPP Motion and Motion to Dismiss, toward preparation of initial letter.	1.00 170.00/hr	170.00
	- PC	Begin drafting summary of voluminous documents submitted by Plaintiffs in support of claims, focusing on Plaintiff's exhibits that comprise portions of insured Orly Taitz's website / blog (approx. 100 exhibits total).	2.30 170.00/hr	391.00
	- PC	Continue analysis of Plaintiff's 1,000-page compendium of 145 exhibits used in support of their First Amended Complaint.	2.00 170.00/hr	340.00
	- PC	Continue drafting summary of complaint in related action Lincoln v. Daylight, in preparation of drafting initial status letter.	0.70 170.00/hr	119.00
9/2/2011	- KS	Telephone call with client Orly Taitz regarding filing response to court request and regarding opposing counsel's disciplinary hearing.	0.20 170.00/hr	34.00
	- KS	Conference regarding plaintiff's bankruptcy and effect on case handling.	0.30 170.00/hr	51.00
	- KS	Update to carrier.	0.30 170.00/hr	51.00
	- KS	Conference regarding finalizing client Orly Taitz's response to court order.	0.40 170.00/hr	68.00
	- PC	Conference with insured Orly Taitz regarding preparation of Response to Litigation History Court Order filing and modifications.	0.70 170.00/hr	119.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/2/2011	- PC	Revise Response to Litigation History Court Order per client instruction, including inclusion of additional sections.	1.80 170.00/hr	306.00
	- PC	Review and vet additional cases [REDACTED] [REDACTED] [REDACTED]	2.20 170.00/hr	374.00
	- PC	Conference with client Orly Taitz regarding recent update on opposing counsel Berg disciplinary actions.	0.30 170.00/hr	51.00
	- PC	Review status and history on opposing counsel Berg disciplinary action in Pennsylvania State Bar.	1.20 170.00/hr	204.00
	- PC	Review Court Orders regarding clarification and modifications to court record based on clerical errors on two separate docket entries by court clerk.	0.70 170.00/hr	119.00
	- PC	Conference with client Orly Taitz regarding significance of court orders on clerical errors, discussion of effects on appeal.	0.30 170.00/hr	51.00
	- PC	Draft correspondence to client Orly Taitz regarding status of appeal and necessity to clarify the court record in district court regarding modification of court order on stay pending appeal, potential motion to dismiss.	1.50 170.00/hr	255.00
	- PC	Revise Response to Litigation History Court.	0.80 170.00/hr	136.00
9/6/2011	- JC	Review District Court's two Notices of Clerical Error, correcting record on appeal to delete non-appellant Orly Taitz, Inc. as party to insured's appeal from denial of anti-SLAPP motion to strike.	0.40 170.00/hr	68.00
	- PC	Review 2005 Court Order sanctioning opposing counsel Berg in federal court based on Rule 11 in Eastern District of Pennsylvania.	0.50 170.00/hr	85.00
	- PC	Continue analysis of Lincoln v. Daylight matter, focusing on Judge Guildford's February 2011 Order Granting in Part and Denying in Part insured Orly Taitz's Motion to Dismiss.	1.30 170.00/hr	221.00
	- PC	Continue analysis of Lincoln v. Daylight matter, focusing on Motions to Dismiss Plaintiff's Amended Complaint filed in March of 2011 filed by insured Taitz and Daylight Chemicals.	2.20 170.00/hr	374.00
	- PC	Continue analysis of Lincoln v. Daylight matter, focusing on opposition to Plaintiff's Motion to Extend Deadlines, preceding Plaintiff's voluntary dismissal of case.	1.80 170.00/hr	306.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
9/6/2011	- PC	Continue review and analysis of Plaintiff's former RICO case and comparison to Lincoln v. Daylight case complaint, and present matter, towards development of strategies related to dismissal of matter.	2.20 170.00/hr	374.00
	- PC	Review Court of Appeals filings regarding correction of court clerk's clerical error.	0.50 170.00/hr	NO CHARGE
9/7/2011	- PC	Review stipulation to extend time to file Motion to Dismiss by Defendant Daylight, as related to defense of insured Orly Taitz.	0.30 170.00/hr	51.00
	- KS	Telephone call from client Orly Taitz regarding court hearing for opposing counsel's disciplinary issues.	0.20 170.00/hr	34.00
9/8/2011	- PC	Conference with client Orly Taitz regarding updated docket, strategy regarding appellate clerical errors.	0.70 170.00/hr	119.00
	- CAB	Telephone call from Clerk USDC regarding corrections made regarding appellant names on docket #289 and #300; Notice of Clerical Error processed	0.10 95.00/hr	9.50
	- JC	Review Notice of Electronic Filing and Stipulation between plaintiffs and defendant, Daylight Corporation, regarding extension to file motion to dismiss regarding first amended complaint.	0.30 170.00/hr	51.00
9/9/2011	- PC	Review court order regarding extension of time for filing for Defendant Daylight Chemicals; and court order requirement of showing of good cause for all future extensions.	0.40 170.00/hr	68.00
	- PC	Preparation for attending hearing on Motion to Dismiss pursuant to FRCP 12(b)(6).	0.60 170.00/hr	102.00
9/12/2011	- JC	Begin review and analysis of twelve page order and findings granting motion to dismiss by defendant, Oracle Corporation, regarding plaintiffs' amended complaint.	0.40 170.00/hr	68.00
	- KS	Correspondence with carrier regarding appeal.	0.20 170.00/hr	34.00
	- KS	Correspondence with client Orly Taitz regarding her desire to respond to the Court.	0.20 170.00/hr	34.00
	- PC	Attend hearing on Motion to Dismiss pursuant to FRCP 12(b)(6) filed by Defendant Oracle Corp., and hearing regarding appellate status.	3.50 170.00/hr	595.00
	- PC	Review Court's 12-page tentative ruling regarding Defendant Oracle Corp.'s Motion to Dismiss Claims One, Two, Three, Five, Six, Eight, Nine, Fourteen, Seventeen, Eighteen, Nineteen, and Twenty pursuant to FRCP 12(b)(6).	0.80 170.00/hr	NO CHARGE

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/12/2011	- PC	Conference with client Orly Taitz regarding appeals strategy, including modification of Order Granting Motion to Stay.	1.00 170.00/hr	170.00
9/13/2011	- PC	Review case filings pursuant to Court suggestion regarding alleged mistake in identification of appealing parties.	0.50 170.00/hr	85.00
	- PC	Email communication with client Orly Taitz regarding correction of court record.	0.20 170.00/hr	34.00
9/14/2011	- JC	Continue review and analysis of court's 12 page order with findings granting defendant, Oracle's motion to dismiss amended complaint	0.40 170.00/hr	68.00
-		[REDACTED]		
-		[REDACTED]		
-		[REDACTED]		
9/15/2011	- JC	Begin review and analysis of motion to dismiss by defendant, Law Offices of O. Taitz, brought by insured, O. Taitz, as to plaintiffs' amended complaint.	0.50 170.00/hr	85.00
-	- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of motion by defendant, Orly Taitz, Inc., to correct order granting stay regarding appeal by O. Taitz and defendant, Defend Our Freedoms Foundation, from denial of anti-SLAPP motion to strike.	0.40 170.00/hr	68.00
-		[REDACTED]		
-		[REDACTED]		
-		[REDACTED]		
-	- PC	Preparation for conference with client Orly Taitz on strategies regarding addressing the Court on issues pertaining to the appellate record and motion to dismiss, in compliance to the Court Order.	0.30 170.00/hr	51.00
-		[REDACTED]		
-		[REDACTED]		
-	- KS	Conference regarding client O Taitz's proposed letter to the judge. (10 pages)	0.50 170.00/hr	85.00
-		[REDACTED]		

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/15/2011	- PC	Review draft correspondence from client Orly Taitz to Court regarding appellate record and motion to dismiss.	0.80 170.00/hr	136.00
	- PC	Conference with client Orly Taitz on strategies regarding addressing the Court on issues pertaining to the appellate record and motion to dismiss, in compliance to the Court Order.	1.00 170.00/hr	170.00
	-	[REDACTED]	[REDACTED]	[REDACTED]
	- PC	Review Motion to Dismiss under FRCP 12(b)(6) filed on behalf of Law Offices of Orly Taitz; 27 page motion and related declaration with exhibits.	2.50 170.00/hr	425.00
	- PC	Review correspondence to court clerk by Plaintiff's counsel, Philip Berg, regarding censure of Defendant Orly Taitz.	1.00 170.00/hr	170.00
	- PC	Review prior court order sanctioning Plaintiff's attorney Berg under Rule 11 in preparation of similar motion request in present litigation.	0.50 170.00/hr	85.00
	- PC	Review correspondence to judge by insured Orly Taitz, in her capacity as an attorney, responding to opposing counsel Philip Berg's correspondence to the clerk.	0.50 170.00/hr	85.00
	- PC	Review Motion to Dismiss filed by Defendant Oracle under FRCP 12(b)(6).	2.00 170.00/hr	340.00
9/16/2011	- JC	Review and analysis of multiple 9/14/11 and 9/15/11 correspondence between insured, O. Taitz, plaintiff, P. Berg, and Court, regarding Taitz's pending motion to dismiss amended complaint and Court's warning regarding potential sanctions against parties and counsel.	0.40 170.00/hr	68.00
	-	[REDACTED]	[REDACTED]	[REDACTED]
	- PC	Review formal request by Plaintiffs to seek TRO preventing client Orly Taitz from further discussion of litigation in the media, and further seeking to prevent Orly Taitz from any future filings.	0.70 170.00/hr	119.00
	-	[REDACTED]	[REDACTED]	[REDACTED]
	- PC	Review Motion to Dismiss filed by the Reed Elsevier Defendants (Lexis et al) under FRCP 12(b)(6).	1.80 170.00/hr	306.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/16/2011	- PC	Begin review Motion to Dismiss filed by Defendant Intelius under FRCP 12(b)(6).	0.50 170.00/hr	85.00
	- PC	Review response from Court Clerk with regard to correspondence from Plaintiff's counsel Berg and Orly Taitz.	0.50 170.00/hr	85.00
	- KS	Analyze client's amended motion.	0.60 170.00/hr	102.00
9/19/2011	- JC	Correspondence with court reporter, and review court reporter's billings, regarding preparation of reporter's transcript for hearing on insured, O. Taitz's anti-SLAPP motion to strike, toward preparation of record on appeal in insured's appeal from denial of motion.	0.30 170.00/hr	51.00
	-	[REDACTED]		
	- PC	Continue review Motion to Dismiss filed by Defendant Intelius under FRCP 12(b)(6).	1.50 170.00/hr	255.00
	- PC	Review Request for Judicial Notice filed by Defendant Intelius in support of its 12(b)(6) motion.	0.50 170.00/hr	85.00
	- PC	Review documentation and evidentiary support from Intelius, including insured Orly Taitz's search results, Intelius Terms and Conditions of and User Agreement, and Intelius Frequently Asked Questions.	1.80 170.00/hr	306.00
	- PC	Review additional documentation and evidentiary support from Intelius, including correspondence from Plaintiff Liberi, correspondence from Plaintiff Ostella, and Intelius correspondence responding to Liberi and Ostella.	1.70 170.00/hr	289.00
	- PC	Review declaration of Benjamin Nelson, custodian of records for Intelius, regarding Intelius websites and divisions, and methodologies regarding searches through website.	0.90 170.00/hr	153.00
	- JC	Review and analysis of opposing counsel's 9/16/11 two correspondence regarding request for leave of court to file motion for Temporary Restraining Order against insured, O. Taitz, regarding alleged defamation and invasion of privacy.	0.40 170.00/hr	68.00
	- JC	Review correspondence of plaintiffs' counsel and separate request for leave of court to file motion to seal court record regarding exhibits to defendant, Intellius' motion to dismiss regarding plaintiffs' private information.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/19/2011	- KS	Conference regarding status and future handling.	0.20 170.00/hr	34.00
	- KS	Update to carrier.	0.20 170.00/hr	34.00
	- JC	Continue review and analysis of motion to dismiss plaintiffs' amended complaint by defendant, Law Offices of Orly Taitz, prepared by insured, O. Taitz.	0.60 170.00/hr	102.00
	- KS	Analyze potential award against plaintiffs.	0.30 170.00/hr	51.00
9/20/2011	- JC	Correspondence with insured, O. Taitz, regarding plaintiffs' counsel soliciting donations from supporters to fund case against insureds, and toward preparation of opening brief in appeal from denial of insured's anti-SLAPP motion to strike complaint.	0.20 170.00/hr	34.00
	- JC	Review correspondence of counsel for defendant, Intellius responding to plaintiffs' request for leave of court to file motion to seal court record regarding exhibits to Intellius' motion to dismiss regarding plaintiffs' private information.	0.20 170.00/hr	34.00
	- JC	Begin review and analysis of reporter's transcript for hearing on insured, O. Taitz's anti-SLAPP motion to strike, toward preparation of record on appeal and opening brief in insured's appeal from denial of motion.	0.60 170.00/hr	102.00
	- JC	Begin review and analysis of motion to dismiss amended complaint by Reed and Lexis defendants.	0.80 170.00/hr	136.00
9/21/2011	- PC	Review correspondence from counsel from Lexis regarding potential MSJ.	0.20 170.00/hr	34.00
	- KS	Conference with carrier regarding e-mail updates from client.	0.10 170.00/hr	17.00
	- PC	Phone conference with counsel for Lexis regarding evidentiary issues related to potential Motion for summary judgment.	0.50 170.00/hr	85.00
	- JC	Continue review and analysis of motion to dismiss complaint by defendant, Law Offices of Orly Taitz, preparation by insured, O. Taitz.	0.50 170.00/hr	85.00
	- PC	Preparation for meeting with counsel for Lexis regarding evidentiary issues related to potential Motion for summary judgment.	0.50 170.00/hr	85.00
	- PC	Review compilation of news items as related to insured Orly Taitz and for use in defense of insured over past 10 days, including blog postings and related to this matter and additional issues related to defense of insured Orly Taitz.	2.50 170.00/hr	425.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/21/2011	- PC	Review and analysis of "Mortgage Fraud Blog," location of initial instance of alleged defamation as to plaintiff Lisa Liberi as guilty of criminal fraud.	1.00 170.00/hr	170.00
	- PC	Continue drafting and revision of detailed and comprehensive litigation budget and analysis for final draft.	2.00 170.00/hr	340.00
	- PC	Telephone call from client Orly Taitz regarding litigation strategy.	0.30 170.00/hr	51.00
9/22/2011	- PC	Review Plaintiff's opposition to Law Offices of Orly Taitz's Motion to Dismiss / Amended Motion to Dismiss as related to defense of insured Orly Taitz, and preparation of comprehensive initial letter and legal strategy.	2.30 170.00/hr	391.00
	- KS	Continue and complete correspondence to carrier regarding budget and future handling.	0.50 170.00/hr	85.00
	- PC	Review Declaration of Philip Berg in support of Plaintiff's opposition to Law Offices' Motion to Dismiss as related to defense of insured Orly Taitz, and preparation of comprehensive initial letter and legal strategy.	0.60 170.00/hr	102.00
	- PC	Review Declaration of Shirley Waddell in support of Plaintiff's opposition to Law Offices' Motion to Dismiss as related to defense of insured Orly Taitz, and preparation of comprehensive initial letter and legal strategy.	0.90 170.00/hr	153.00
	- PC	Continue drafting litigation budget and analysis for final draft.	1.70 170.00/hr	289.00
	- PC	Review Plaintiff's Objection to Law Offices of Orly Taitz's Motion to Dismiss / Amended Motion to Dismiss as related to defense of insured Orly Taitz, and preparation of comprehensive initial letter and legal strategy.	2.00 170.00/hr	340.00
9/23/2011	- KS	Conference regarding possible response by client to opposing counsel's request for authority from Court.	0.30 170.00/hr	51.00
	- KS	Preparation of correspondence to carrier regarding plaintiff's counsel's lengthy and non-sequitur ex-parte communication to the judge.	0.10 170.00/hr	17.00
9/26/2011	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		

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		<u>Hrs/Rate</u>	<u>Amount</u>
	[REDACTED]		
9/26/2011 -	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
- PC	Review Plaintiff's opposition to Reed Defendant's 12(b)(6) Motion to Dismiss, in preparation and support of defense of insured Orly Taitz, continued evaluation and Initial Analysis, and in preparation for Orly Taitz Appeal.	2.20 170.00/hr	374.00
- PC	Review Declaration of Philip Berg in support of Plaintiff's opposition to Reed Defendant's 12(b)(6) Motion to Dismiss, in preparation and support of defense of insured Orly Taitz, continued evaluation and Initial Analysis, and in preparation for Orly Taitz Appeal.	0.40 170.00/hr	68.00
- PC	Review Declaration of plaintiff Lisa Ostella in support of Plaintiff's opposition to Reed Defendant's 12(b)(6) Motion to Dismiss, in preparation and support of defense of insured Orly Taitz, continued evaluation and Initial Analysis, and in preparation for Orly Taitz Appeal.	0.80 170.00/hr	136.00
- PC	Review Declaration of plaintiff Lisa Liberi in support of Plaintiff's opposition to Reed Defendant's 12(b)(6) Motion to Dismiss, in preparation and support of defense of insured Orly Taitz, continued evaluation and Initial Analysis, and in preparation for Orly Taitz Appeal.	1.20 170.00/hr	204.00
- PC	Review Plaintiff's opposition to Defendant Intelius's 12(b)(6) Motion to Dismiss, in preparation and support of defense of insured Orly Taitz, continued evaluation and Initial Analysis, and in preparation for Orly Taitz Appeal.	2.00 170.00/hr	340.00
- PC	Review Declaration of opposing counsel Philip Berg in support of Plaintiff's opposition to Defendant Intelius's 12(b)(6) Motion to Dismiss, in preparation and support of defense of insured Orly Taitz, continued evaluation and Initial Analysis, and in preparation for Orly Taitz Appeal.	0.40 170.00/hr	68.00
- PC	Review Declaration of plaintiff Lisa Ostella in support of Plaintiff's opposition to Defendant Intelius's 12(b)(6) Motion to Dismiss, in preparation and support of defense of insured Orly Taitz,	0.50 170.00/hr	85.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
		continued evaluation and Initial Analysis, and in preparation for Orly Taitz Appeal.		
9/26/2011	- PC	Review Declaration of plaintiff Lisa Liberi in support of Plaintiff's opposition to Defendant Intelius's 12(b)(6) Motion to Dismiss, in preparation and support of defense of insured Orly Taitz, continued evaluation and Initial Analysis, and in preparation for Orly Taitz Appeal.	0.50 170.00/hr	85.00
	- KS	Conference regarding strategy for opposing counsel's Law and Motion.	0.40 170.00/hr	68.00
9/27/2011	-	[REDACTED]		
	- PC	Continue preparation of Initial Analysis and Strategy, revisions and updates to sections regarding Plaintiffs pursuant to recent declarations filed in support of oppositions to Motions to Dismiss.	2.00 170.00/hr	340.00
9/28/2011	-	[REDACTED]		
	-	[REDACTED]		
9/30/2011	- PC	Review counsel M. Naborski request on behalf of Daylight regarding motion to dismiss, as related to defense of insured Orly Taitz.	0.40 170.00/hr	68.00
10/1/2011	-	[REDACTED]		
	-	[REDACTED]		
	- JC	Multiple correspondence with opposing counsel for defendant, Daylight Corporation, and with court, regarding such defendant's request for leave to file motion to dismiss plaintiffs' first amended complaint.	0.30 170.00/hr	51.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
10/3/2011	- PC	Review Declaration of Ben Nelson, Intelius employee, as related to claims against insured Orly Taitz and Orly Taitz defense, and comparison to issues Nelson addresses in the Liberi declaration.	1.00 170.00/hr	170.00
	- PC	Review of 22-page Objections to Declaration of Lisa Liberi by Defendant Intelius, as related to claims against insured Orly Taitz and Orly Taitz Defense.	2.00 170.00/hr	340.00
	- PC	Review the Reed Defendants' Response to Motion to Dismiss, as related to claims against insured Orly Taitz and Orly Taitz Defense.	0.90 170.00/hr	153.00
	- PC	Review Intelius's Response regarding Plaintiff's objection to Lexis and Intelius Search Results submitted for judicial notice supporting Intelius's Motion to Dismiss, as related to claims against insured Orly Taitz and Orly Taitz Defense.	1.10 170.00/hr	187.00
10/4/2011	- PC	Review Law Offices of O. Taitz Reply Brief in response to Plaintiff's opposition to Motion to Dismiss.	2.00 170.00/hr	340.00
	- PC	Review Court Order denying authority for Law Offices of O. Taitz's filing of 12(b)(6) motion to dismiss.	0.20 170.00/hr	34.00
	- PC	Review Court Order staying matter as to Law Offices of O. Taitz pending 9th circuit appeal by client, Orly Taitz.	0.30 170.00/hr	51.00
	- JC	Review and analysis of court's 10/4/11 notice of filing and summary of order, and court's 10/3/11 order regarding defendant, Law Offices of O. Taitz's motion to dismiss complaint and amending scope of stay regarding insured, O. Taitz's anti-SLAPP motion to dismiss, regarding insured's appeal from denial of motion to strike.	0.40 170.00/hr	68.00
	- PC	Review court order denying Law Offices of O. Taitz's Request to file 12(b)(6) motion to dismiss.	0.30 170.00/hr	51.00
	- PC	Review court order denying Plaintiff's request for TRO against Insured Orly Taitz.	0.30 170.00/hr	51.00
10/5/2011	- JC	Begin review and analysis of 10/3/11 order denying defendants' various requests for leave to file several motions, including as to order denying insured, O. Taitz's request for leave to file motion requiring bond from plaintiffs.	0.30 170.00/hr	51.00
	- MLC	Begin drafting Declaration of Peter Cook in Support of Motion to Consolidate Appeals.	0.30 95.00/hr	28.50
	- PC	Begin preparation of [REDACTED] [REDACTED] [REDACTED]	0.50 170.00/hr	85.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/5/2011	JC	Begin review and analysis of 10/3/11 order denying defendants' various requests for leave to file several motions, including portion denying insured, O. Taitz's request to amend court docket regarding her appeal from denial of insured's anti-SLAPP motion to strike complaint.	0.30 170.00/hr	51.00
-		[REDACTED]		
-		[REDACTED]		
-	PC	Begin strategic analysis regarding impact of court orders regarding Law Offices of O. Taitz and Orly Taitz, Inc. in preparation for detailed status update to client.	0.70 170.00/hr	119.00
-		[REDACTED]		
-		[REDACTED]		
-		[REDACTED]		
-		[REDACTED]		
-		[REDACTED]		
-	JC	Continue preparation of motion by insured, O. Taitz, to consolidate appeals by her and defendant, Defend Our Freedom Foundation, regarding denial of anti-SLAPP motion to strike complaint.	0.30 170.00/hr	51.00
10/6/2011	PC	Draft status update and legal analysis to carrier regarding status of other Defendants in matter, including Oracle, Lexis and Intelius.	0.70 170.00/hr	119.00
-	PC	Review status of Sankey Defendants for purpose of providing status update to carrier.	0.30 170.00/hr	51.00
-	PC	Draft status update and legal analysis to carrier regarding status of other Defendants, Daylight Chemicals and the Sankeys.	0.20 170.00/hr	34.00

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[illegible]

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			Hrs/Rate	Amount
10/10/2011	- PC	Continue analysis of Plaintiffs / Plaintiffs attorney's past sanctions in Lincoln v. Daylight matter in support of filing Rule 11 Motion for sanctions / attorneys fees.	1.40 170.00/hr	238.00
	- PC	Continue analysis of Plaintiffs / Plaintiffs attorney's complaints in Pennsylvania state bar in support of filing Rule 11 Motion for sanctions / attorneys fees.	1.20 170.00/hr	204.00
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
10/12/2011	- PC	Continue analysis of advantages and disadvantages of potential stipulation by all parties, including Plaintiffs and insured, to consolidation of the Orly Taitz and DOFF appeal.	1.00 170.00/hr	170.00
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
	- JC	Continue review and evaluation of documents filed in District Court regarding anti-SLAPP motion to strike plaintiffs' complaint by insured, O. Taitz, and defendant, Defend Our Freedoms Foundation, toward preparation of record on appeal in appeals from denial of anti-SLAPP motion to strike.	2.10 170.00/hr	357.00
	-	[REDACTED]		
		[REDACTED]		
	- PC	Review and revise Motion for Consolidation of the Orly Taitz and DOFF appeals.	0.70 170.00/hr	119.00
	- PC	Analysis of advantages and disadvantages of potential stipulation by all parties, including Plaintiffs and insured, to consolidation of the Orly Taitz and DOFF appeal.	1.00 170.00/hr	170.00
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/12/2011	- JC	Continue drafting motion to consolidate appeals by insured, O. Taitz, regarding her and defendant, Defend Our Freedoms Foundation's appeals from denial of their anti-SLAPP motion to strike plaintiff's complaint.	2.45 170.00/hr	416.03
	- JC	Continue evaluation of legal issues regarding applicable standards of appellate review regarding appeals by insured, O. Taitz, in support of her and defendant, Defend Our Freedoms Foundation's appeals from denial of their anti-SLAPP motion to strike plaintiff's complaint.	1.80 170.00/hr	306.00
	- JC	Continue drafting of opening brief regarding appeal by insured, O. Taitz, regarding her and defendant, Defend Our Freedoms Foundation's appeals from denial of their anti-SLAPP motion to strike plaintiff's complaint.	1.20 170.00/hr	204.00
10/13/2011	- JC	Begin review and analysis of plaintiffs' lengthy Memorandum of Points and Authorities in opposition to insured, O. Taitz's anti-SLAPP motion to strike plaintiffs' complaint, toward preparation of insured's opening brief in appeal from denial of motion.	0.80 170.00/hr	136.00
	- PC	Draft correspondence to insured, O. Taitz regarding stipulation to Motion to Consolidate appeals.	0.50 170.00/hr	85.00
10/14/2011	- PC	Revise and submit correspondence to insured, O. Taitz regarding consolidation of appeals of DOFF and Taitz.	0.50 170.00/hr	85.00
	-			
	- PC	Draft and revise Stipulation for Consolidation of appeals by all parties.	1.20 170.00/hr	204.00
	- JC	Multiple correspondence with insured, O. Taitz, regarding seeking consolidation of pending appeals by insured and related defendant, Defend Our Freedoms Foundation, regarding denial of insured's anti-SLAPP motion to strike complaint.	0.30 170.00/hr	51.00
10/17/2011	- JC	Continue review and analysis of plaintiffs' voluminous opposition, with several declarations and documentary evidence, in opposition to insured, O. Taitz's and defendant, Defend Our Freedoms Foundation's anti-SLAPP motion to dismiss plaintiffs' complaint, toward preparation of opening brief in appeal from denial of motion.	0.60 170.00/hr	102.00
	- PC	Revisions to status update to carrier.	1.00 170.00/hr	170.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/17/2011	- KS	Finalize update to carrier.	0.30 170.00/hr	51.00
	- JC	Begin review and analysis of court's 21 page tentative ruling on motion to dismiss by multiple Reed Company defendants, toward preparation for hearing on motion and evaluation of ruling as it affects insureds, Orly and Yosef Taitz.	1.10 170.00/hr	187.00
	- JC	Begin review and analysis of court's 6 page tentative ruling on motion to dismiss by defendant, Intelius Corporation, toward preparation for hearing on motion and evaluation of ruling as it affects insureds, Orly and Yosef Taitz.	0.50 170.00/hr	85.00
	- JC	Travel to and from court for hearing on motions to dismiss by Reed and Intellius defendants as to plaintiffs' first amended complaint.	1.70 170.00/hr	289.00
	- JC	Attend hearing on motions to dismiss by Reed and Intellius defendants as to plaintiffs' first amended complaint.	1.70 170.00/hr	289.00
	- JC	Meeting with insured, O. Taitz, regarding preparation of coordinated opening briefs and record on appeal in appeals by insured and defendant, Defend Our Freedoms Foundations, of denial of joint anti-SLAPP motion to dismiss plaintiffs' complaint.	0.40 170.00/hr	68.00
10/18/2011	- KS	Telephone call with carrier regarding future handling.	0.20 170.00/hr	34.00
	-	[REDACTED]		
	-	[REDACTED]		
	-	[REDACTED]		
	-	[REDACTED]		
	- PC	Analysis of Judge A. Robreno order regarding dishonesty of Plaintiffs under oath at Preliminary Injunction hearing that took place in December of 2010, as pertaining to Rule 11 Sanctions issue.	1.20 170.00/hr	204.00
	- PC	Analysis of Plaintiff's request to file for leave to amend complaint as related to Anti-SLAPP claims pertaining to client Orly Taitz and Taitz's pending appeal.	1.00 170.00/hr	170.00
	- PC	Analysis of Plaintiff's request to file for leave to amend complaint as related to Anti-SLAPP claims pertaining to client Orly Taitz and Taitz's pending appeal.	1.00 170.00/hr	170.00

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			Hrs/Rate	Amount
10/18/2011	- PC	Brief review Court's finalized order granting in part Intelius's Motion to Dismiss as related to Anti-SLAPP claims pertaining to client Orly Taitz and Taitz's pending appeal.	0.20 170.00/hr	34.00
	- PC	Brief review Court's finalized order granting in part Reed's Motion to Dismiss as related to Anti-SLAPP claims pertaining to client Orly Taitz and Taitz's pending appeal.	0.20 170.00/hr	34.00
	-	[REDACTED]		
10/19/2011	- JC	Begin analysis of legal issues regarding request for judicial notice of prior relevant litigation involving plaintiff, P. Berg and insured, O. Taitz, in support of insured's appeal from order denying insured's anti-SLAPP motion to dismiss complaint and toward preparation of supporting record on appeal.	0.40 170.00/hr	68.00
	- JC	Begin review and analysis of court's 21 page final ruling on motions to dismiss amended complaint by defendants, Reed Companies and Intelius.	0.60 170.00/hr	102.00
	-	[REDACTED]		
	-	[REDACTED]		
	-	[REDACTED]		
	-	[REDACTED]		
	-	[REDACTED]		
	- PC	Begin analysis of potential cross-claims by Intelius and Reed Defendants as to each of insureds Orly Taitz and Yosef Taitz pursuant to the FRCA, 15 U.S.C. § 1681.	1.50 170.00/hr	255.00
	-	[REDACTED]		
10/20/2011	- JC	Review and analysis of court's final order denying motion to dismiss complaint by defendant, Intelius, after court took motion under submission after hearing.	0.30 170.00/hr	51.00
10/21/2011	- PC	Continue analysis of potential cross-claims as to insured Orly Taitz under surviving claims against Reed and Intelius for equitable indemnity.	2.60 170.00/hr	442.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/21/2011	- KS	Telephone call with carrier regarding status.	0.20 170.00/hr	34.00
10/24/2011	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
10/25/2011	- JC	Review court's final minutes and related notice of electronic filing regarding motion to dismiss complaint by defendant, Intelius Corporation.	0.30 170.00/hr	51.00
10/26/2011	- JC	Continue drafting of insured, O. Taitz's opening brief in appeal from denial of insured's anti-SLAPP motion to strike plaintiff's complaint.	0.50 170.00/hr	85.00
10/28/2011	- JC	Receipt and review of notice of filing of reporter's transcript regarding hearing on defendant, Oracle Corporation's motion to dismiss amended complaint, regarding plaintiffs' potential appeal from granting of such motion.	0.30 170.00/hr	51.00
11/1/2011	- JC	Continue drafting of insured, O. Taitz's opening brief in appeal from denial of her anti-SLAPP motion to strike as to plaintiff's complaint.	0.50 170.00/hr	85.00
11/2/2011	- JC	Multiple telephone conferences with J. Vogt, counsel for defendant Intelius Corporation, regarding status of pleadings including plaintiffs' pending request for leave to file proposed second amended complaint and defendants' opposition position.	0.30 170.00/hr	51.00
11/3/2011	- KS	Correspondence with client regarding default.	0.10 170.00/hr	17.00
	- MLC	Correspondence from and return correspondence to opposing counsel for Intelius regarding status of declaration by Orly Taitz for their summary judgment.	0.10 95.00/hr	9.50
	- JC	Receipt and review numerous notices of electronic filing from court regarding multiple answers by several Reed Elsevier defendants to first amended complaint.	0.30 170.00/hr	51.00
	- JC	Telephone conference with opposing counsel for defendant, Intelius, regarding proposal for insured, O. Taitz, to submit declaration supporting Intelius' motion for summary judgment in lieu of deposition by insured, and discussing proposed substance of declaration.	0.30 170.00/hr	51.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
11/3/2011	- JC	Receipt and review of plaintiffs' counsel's 11/3/11 e-mail to court, and related application, seeking leave to file application to enter default against several Intelius defendants, and Intelius's response to application.	0.40 170.00/hr	68.00
	- JC	Correspondence with insured, O. Taitz, and other defense counsel regarding upcoming State Bar disciplinary hearing against plaintiffs' counsel, potential termination of counsel's representation of plaintiffs, and preparation for hearing.	0.20 170.00/hr	34.00
11/4/2011	- JC	Begin review and analysis of eleven page answer and affirmative defenses of defendant, Lexis Nexis, Inc., to plaintiffs' first amended complaint.	0.60 170.00/hr	102.00
	- MLC	Telephone call from opposing counsel for Intelius regarding Declaration from Orly Taitz and the Sankey Defendants to support their Motion for Summary Judgment.	0.10 95.00/hr	9.50
11/7/2011	- JC	Begin review and analysis of lengthy (65 page) answer and affirmative defenses of defendant, Intelius Inc., to plaintiffs' first amended complaint, including portions [REDACTED]	0.50 170.00/hr	85.00
	- JC	Begin review and analysis of 42 page answer and affirmative defenses of defendant, Lexis Nexis Choicepoint Risk Assets, Inc., to plaintiffs' first amended complaint.	0.70 170.00/hr	119.00
	- JC	Begin review and analysis of 42 page answer and affirmative defenses of defendant, Lexis Nexis Risk Data Management, Inc., sued as Lexis Nexis Seisint, Inc., to plaintiffs' first amended complaint.	0.70 170.00/hr	119.00
	- JC	Begin review and analysis of 41 page answer and affirmative defenses of defendant, Reed Elsevier, Inc., to plaintiffs' first amended complaint.	0.60 170.00/hr	102.00
	- JC	Begin review and analysis of 40 page answer and affirmative defenses of defendant, Lexis Nexis Risk and Information Analytics Group, Inc., to plaintiffs' first amended complaint.	0.70 170.00/hr	119.00
	- JC	Begin review and analysis of 43 page answer and affirmative defenses of defendant, Lexis Nexis Risk Solutions, Inc., to plaintiffs' first amended complaint.	0.70 170.00/hr	119.00
	- JC	Begin analysis for insured, O. Taitz, and carrier regarding proposed declaration from O. Taitz supporting motion for summary judgment by defendant, Intelius Inc., and weighing potential advantages and disadvantages of proposed declaration including as to potential cross-claim by insured.	0.50 170.00/hr	85.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/7/2011	- JC	Preparation of report and legal analysis for insured, O. Taitz, regarding preparation of her and defendant, Defend Our Freedoms Foundation's opening briefs in related appeals and preparation of supporting record on appeal.	0.40 170.00/hr	68.00
11/8/2011	- JC	Begin legal analysis for carrier and insured, O. Taitz, regarding dispute involving request by defendant, Intelius, Inc., that insured submit declaration supporting Intelius' motion for summary judgment, [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	0.90 170.00/hr	153.00
	- JC	Multiple correspondence with insured, O. Taitz, regarding her proposed declaration supporting motion for summary judgment by defendant, Intelius, Inc., [REDACTED] [REDACTED]	0.40 170.00/hr	68.00
	- JC	Multiple telephone conferences with E. Chang, counsel for defendant, Intelius, Inc., regarding Intelius' request for declaration from insured, O. Taitz, supporting motion for summary judgment by Intelius.	0.30 170.00/hr	51.00
	- JC	Lengthy telephone conference with E. Chang, counsel for defendant, Intelius, Inc., regarding deposition of insured, O. Taitz, objections to deposition, and potential motion to compel deposition by Intelius.	0.40 170.00/hr	68.00
11/9/2011	- KS	Correspondence with client regarding opposing counsel.	0.20 170.00/hr	34.00
11/10/2011	- JC	Continue preparation of lengthy opening brief of insured, O. Taitz, in appeal regarding denial of insured's and defendant, Defend Our Freedoms Foundation's anti-SLAPP motion to strike plaintiff's complaint.	1.10 170.00/hr	187.00
	- JC	Multiple correspondence with E. Chang, counsel for defendant, Intelius Corporation, regarding its proposed declaration from insured, O. Taitz, supporting Intelius' motion for summary judgment on complaint.	0.30 170.00/hr	51.00
	- KS	Correspondence with carrier regarding demand for declaration and deposition, plus possible sanctions.	0.30 170.00/hr	51.00
11/11/2011	- KS	Conference regarding Intelius' demands.	0.30 170.00/hr	51.00
	- JC	Continue review and analysis of 65 page answer and affirmative defenses of defendant, Intelius Corporation, to plaintiffs' first amended complaint.	0.80 170.00/hr	136.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/11/2011	- KS	Correspondence with client regarding appeal.	0.20 170.00/hr	34.00
	- KS	Authority from carrier, Laurie Johnson regarding Intelius.	0.10 170.00/hr	17.00
	- KS	Conference regarding how to approach Intelius.	0.30 170.00/hr	51.00
	- JC	Correspondence with adjuster L. Johnson regarding dispute with defendant, Intelius Corporation, regarding deposition of insured, O. Taitz, and potential motion to compel deposition and for sanctions by Intelius.	0.20 170.00/hr	34.00
	- JC	Multiple correspondence with E. Chang, counsel for defendant, Intelius Corporation, regarding proposed deposition of insured, O. Taitz, and potential motion to compel deposition.	0.30 170.00/hr	51.00
11/14/2011	- JC	Continue drafting of lengthy and complex opening brief of insured, O. Taitz, in appeal from denial of insured's anti-SLAPP motion to strike plaintiffs' complaint.	2.20 170.00/hr	374.00
	- JC	Continue preparation of lengthy record on appeal supporting opening brief of insured, O. Taitz, in appeal from denial of insured's anti-SLAPP motion to strike plaintiffs' complaint.	2.20 170.00/hr	374.00
	- JC	Begin evaluation of complex legal issues regarding Court of Appeal jurisdiction in appeal from interlocutory order denying insured, O. Taitz's anti-SLAPP motion to strike plaintiffs' complaint.	0.90 170.00/hr	153.00
11/15/2011	- JC	Multiple correspondence with insured, O. Taitz, regarding coordination of her opening brief and opening brief of defendant, Defend Our Freedoms Foundations, in joint appeal from denial of anti-SLAPP motion to strike regarding plaintiffs' complaint.	0.30 170.00/hr	51.00
	- JC	Correspondence with E. Chang, counsel for defendant, Intelius Corporation, regarding proposed deposition of insured, O. Taitz, and potential motion to compel deposition.	0.20 170.00/hr	34.00
	- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of request to Ninth Circuit Court of Appeals for extension for related party, Defend Our Freedoms Foundations (represented by O. Taitz), to file opening brief and record on appeal in joint appeal by insured and Defend Our Freedoms from denial of anti-SLAPP motion to strike complaint.	0.30 170.00/hr	51.00
11/16/2011	- JC	Drafting of correspondence to all counsel regarding request to Ninth Circuit Court of Appeals for extension for related party, Defend Our Freedoms Foundations (represented by insured, O. Taitz), to file opening brief and record on appeal in joint appeal	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
		by insured and Defend Our Freedoms from denial of anti-SLAPP motion to strike complaint.		
11/16/2011 -	KS	Correspondence with carrier, Laurie Johnson, regarding authority for Intelius Motion.	0.10 170.00/hr	NO CHARGE
11/17/2011 -	JC	Multiple correspondence with counsel for defendant, Intelius Corporation, regarding proposed deposition of insured, O. Taitz, and potential motion to compel insured's deposition.	0.30 170.00/hr	51.00
	- KS	Authority from carrier, Laurie Johnson regarding seeking court approval.	0.10 170.00/hr	17.00
11/18/2011 -	JC	Begin preparation of request to court for clarification of stay regarding defendant, Intelius Corporation's request for insured, O. Taitz, to submit declaration or for deposition regarding Intelius's motion for summary judgment, and in anticipation of Intelius's motion to compel insured to attend deposition and for sanctions.	1.10 170.00/hr	187.00
	- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of request to court of appeals for extension for related party, Defend Our Freedoms Foundations (represented by O. Taitz), to file opening brief in joint appeal by insured and Defend Our Freedoms from denial of anti-SLAPP motion to strike.	0.30 170.00/hr	51.00
	- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of correspondence to court for clarification of stay regarding request by defendant, Intelius Corporation, for insured's deposition, and in anticipation of motion to compel deposition by Intelius.	0.30 170.00/hr	51.00
11/21/2011 -	JC	Multiple correspondence with insured, O. Taitz, regarding revisions to proposed correspondence to court for clarification of stay regarding request by defendant, Intelius Corporation, for insured's deposition, and in anticipation of motion to compel deposition by Intelius.	0.30 170.00/hr	51.00
	- JC	Draft revised correspondence to court for clarification of stay regarding request by defendant, Intelius Corporation, for insured's deposition, and in anticipation of motion to compel deposition by Intelius, with revisions requested by insured, O. Taitz.	0.30 170.00/hr	51.00
	- JC	Multiple telephone conference with insured, O. Taitz, regarding development of legal arguments supporting opening briefs of insured and defendant, Defend Our Freedoms Foundations, in related appeals from denial of defendants' anti-SLAPP motion to strike regarding plaintiffs' complaint.	0.40 170.00/hr	68.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/21/2011	- AV	Finalized letter to District Court Judge for electronic filing.	0.20 95.00/hr	19.00
	- JC	Multiple telephone conferences with opposing counsel for defendant, Intelius Corporation, regarding deposition of insured, O. Taitz, and potential motion to compel deposition by Intelius.	0.30 170.00/hr	51.00
	- KS	Conference regarding client's appeal.	0.40 170.00/hr	68.00
	- KS	Conference regarding appeal.	0.20 170.00/hr	34.00
11/22/2011	- JC	Multiple correspondence with insured, O. Taitz, counsel for defendant and appellant, Defend Our Freedoms Foundations, in appeal by it and insured, O. Taitz, from denial of anti-SLAPP motion to strike plaintiffs' complaint, regarding correction by O. Taitz of notice of extension to file opening brief.	0.30 170.00/hr	51.00
	- JC	Begin drafting portions of insured, O. Taitz's opening brief addressing complex legal issues regarding plaintiffs' evidentiary burdens in opposition to insured's anti-SLAPP motion to strike plaintiffs' complaint, and court's discretion to rule on evidentiary objections, in appeal from denial of anti-SLAPP motion to strike plaintiffs' complaint.	0.90 170.00/hr	153.00
	- EA	Prepare and file electronically with the Court correspondence seeking leave to file motion for clarification on behalf of insured, as required to be done personally by counsel only by the United States District Court	0.40 170.00/hr	68.00
	- JC	Telephone conference with insured, O. Taitz, regarding obtaining Pennsylvania State Bar decision and transcript of hearing regarding disciplinary action against plaintiffs' counsel, P. Berg, and his potential disbarment, toward use in subject case to remove opposing counsel.	0.20 170.00/hr	34.00
	- JC	Multiple correspondence with insured, O. Taitz, toward preparation of portion of record on appeal regarding insured's previous motions to dismiss and strike plaintiffs' complaint in related Pennsylvania case, in pending appeal from denial of anti-SLAPP motion to strike plaintiffs' complaint.	0.30 170.00/hr	51.00
	- JC	Begin review and analysis of numerous motions to dismiss and strike plaintiffs' complaint in related Pennsylvania case, in appeal by insured, O. Taitz, from denial of anti-SLAPP motion to strike plaintiffs' complaint in Santa Ana District Court, and toward evaluation of plaintiffs' legal arguments regarding mootness of subject motion to strike involved in pending appeal.	0.60 170.00/hr	102.00
	- JC	Begin evaluation of complex legal issues regarding court's discretion to grant leave to amend complaint, regarding California's anti-SLAPP statute and plaintiff's burden to establish	1.60 170.00/hr	272.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	merit of claims, toward drafting of insured, O. Taitz's opening brief in appeal from denial of anti-SLAPP motion to strike plaintiffs' complaint.		
11/22/2011 - JC	Review notice of extension to file opening brief by defendant, Defend Our Freedoms Foundations, in appeal by it and insured, O. Taitz, from denial of anti-SLAPP motion to strike plaintiffs' complaint.	0.20 170.00/hr	34.00
- JC	Begin evaluation of complex legal issues regarding insured, O. Taitz's alleged acts as constituting petitions for redress of grievances to government under California anti-SLAPP statute, toward drafting of insured, O. Taitz's opening brief in appeal from denial of anti-SLAPP motion to strike plaintiffs' complaint.	1.40 170.00/hr	238.00
- JC	Begin evaluation of complex legal issues regarding plaintiffs' evidentiary burdens in opposition to insured, O. Taitz's anti-SLAPP motion to strike plaintiffs' complaint, toward drafting of insured, O. Taitz's opening brief in appeal from denial of anti-SLAPP motion to strike plaintiffs' complaint.	0.80 170.00/hr	136.00
11/23/2011 - JC	Begin drafting portions of insured, O. Taitz's opening brief addressing complex legal issues regarding her alleged acts as constituting petitions for redress of grievances to government under California anti-SLAPP statute, in appeal from denial of anti-SLAPP motion to strike plaintiffs' complaint.	1.10 170.00/hr	187.00
- JC	Telephone conference with insured, O. Taitz, regarding her proposed application to Ninth Circuit Court of Appeals for appointment of appellate panel involved in related O. Taitz appeal in subject appeal by insured from denial of anti-SLAPP motion to strike regarding plaintiffs' complaint.	0.20 170.00/hr	34.00
- JC	Begin drafting of portions of opening brief of insured, O. Taitz, addressing complex legal issues regarding court's discretion to grant leave to amend complaint, regarding California's anti-SLAPP statute and plaintiff's burden to establish merit of claims, in appeal from denial of anti-SLAPP motion to strike plaintiffs' complaint.	1.20 170.00/hr	204.00
11/28/2011 -	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
-	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/28/2011	- JC	Begin review and analysis of records of Pennsylvania State Bar regarding disciplinary proceedings against plaintiffs' counsel, P. Berg, toward evaluation of potential disbarment or suspension and effect on ability to represent plaintiffs' in subject case.	0.40 170.00/hr	68.00
	- JC	Continue review and analysis of insured, O. Taitz's anti-SLAPP motion to strike plaintiff's complaint in related Pennsylvania litigation, toward preparation of voluminous record on appeal in appeal from denial of insured and defendant, Defend Our Freedoms Foundation's anti-SLAPP motion to strike.	0.60 170.00/hr	102.00
	- JC	Begin review and analysis of plaintiff, P. Berg's "Obama Crimes" website toward preparation of record on appeal supporting insured, O. Taitz's appeal from denial of insured and defendant, Defend Our Freedoms Foundation's anti-SLAPP motion to strike, and toward support of public interest element [REDACTED] for anti-SLAPP relief.	0.60 170.00/hr	102.00
11/29/2011	- [REDACTED]	[REDACTED]		
	- [REDACTED]	[REDACTED]		
	- [REDACTED]	[REDACTED]		
	- [REDACTED]	[REDACTED]		
	- JC	Begin evaluation of legal issues regarding request for judicial notice in federal court appeal, including requirements under federal rules of appellate procedure and ninth circuit appellate rules, toward preparation of insured, O. Taitz's request for judicial notice of various related cases in appeal from denial of anti-SLAPP motion to strike plaintiffs' complaint.	0.90 170.00/hr	153.00
	- JC	Begin drafting request of insured, O. Taitz, for judicial notice of various related cases in support of opening brief in appeal from denial of anti-SLAPP motion to strike plaintiffs' complaint.	2.20 170.00/hr	374.00
	- CAB	Receipt and review document from Defendant Intelius, Inc. regarding Notice of Deposition of Orly Taitz	0.10 95.00/hr	9.50
	- JC	Continue evaluation of complex legal issues regarding appealability of order denying anti-SLAPP motion to strike complaint under federal collateral order doctrine, and analysis of applicable Ninth Circuit decisions, toward drafting of opening brief of insured, O. Taitz, in appeal from denial of anti-SLAPP motion to strike as to plaintiffs' complaint.	0.90 170.00/hr	153.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/30/2011	- JC	Begin evaluation of FRCP requirements regarding preparation of objections to notice of deposition of insured, O. Taitz, by defendant, Intelius Corporation, including preparation of potential motion for protective order based on pending stay of case regarding insured's appeal.	0.50 170.00/hr	85.00
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
	- JC	Receipt and review notice of deposition of insured, O. Taitz, by defendant, Intelius Corporation.	0.30 170.00/hr	51.00
12/1/2011	- JC	Continue drafting of lengthy opening brief by insured, O. Taitz, in appeal from denial of anti-SLAPP motion to strike Plaintiffs' complaint.	1.90 170.00/hr	323.00
	- JC	Correspondence with insured, O. Taitz, regarding her deposition, objections to deposition and potential motion for protective order regarding deposition.	0.30 170.00/hr	51.00
	- JC	Begin drafting of objections by insured, O. Taitz, to notice of her deposition by defendant, Intelius Inc.	0.50 170.00/hr	85.00
	- JC	Telephone conference with insured, O. Taitz, regarding drafting of objections by insured to notice of her deposition by defendant, Intelius Inc.	0.20 170.00/hr	34.00
12/2/2011	- KS	Correspondence with carrier regarding status.	0.30 170.00/hr	51.00
	- JC	Continue evaluation of complex key legal issues regarding litigation as form of petition for redress of grievances under U.S. Constitution, First Amendment, regarding development of insured, O. Taitz's legal arguments supporting her opening brief in appeal from denial of anti-SLAPP motion to strike plaintiffs' complaint.	1.20 170.00/hr	204.00
	- JC	Begin preparation of legal analysis for insured, O. Taitz, regarding requests by defendant, Intelius Corporation, for insured to submit declaration or be deposed, toward preparation of objections to deposition notice to insured and preparation of potential motion for protective order regarding deposition.	0.40 170.00/hr	68.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
12/2/2011	- JC	Begin drafting of update to carrier regarding status of appeal, dispute regarding insured, O. Taitz's deposition and potential motion for protective order, and motion to dismiss involving insured, Y. Taitz.	0.80 170.00/hr	136.00
	- JC	Review court's 12/2/11 order denying plaintiffs' application to file second amended complaint.	0.30 170.00/hr	51.00
	- JC	Continue drafting of lengthy opening brief by insured, O. Taitz, in appeal from denial of anti-SLAPP motion to strike Plaintiffs' complaint.	3.10 170.00/hr	527.00
12/3/2011	- JC	Continue drafting of lengthy portion of opening brief by insured, O. Taitz, in appeal from denial of anti-SLAPP motion to strike Plaintiffs' complaint, regarding insured's burden to show acts in furtherance of First Amendment rights.	3.20 170.00/hr	544.00
	- JC	Correspondence with insured, O. Taitz, regarding preparation of her and defendant, Defend Our Freedoms Foundation's opening briefs in appeal from denial of anti-SLAPP motion to strike complaint.	0.20 170.00/hr	34.00
12/5/2011	- KS	Correspondence with client regarding protective order.	0.20 170.00/hr	34.00
	- KS	Conference regarding appellate brief.	0.60 170.00/hr	102.00
	- JC	Draft report to carrier with attorney analysis regarding plaintiffs' request for leave regarding proposed second amended complaint, and denial of plaintiffs' request.	0.30 170.00/hr	51.00
	- JC	Telephone conference and correspondence with opposing counsel P. Berg, counsel for plaintiffs, regarding insured, O. Taitz's deposition as noticed by defendant, Intelius Corporation, and objections to deposition.	0.40 170.00/hr	68.00
	- JC	Continue analysis of complex legal issues regarding litigation as Constitutional right of petition under California anti-SLAPP law, toward drafting of portion of insured's opening brief addressing issues in appeal from denial of anti-SLAPP motion to strike complaint.	0.70 170.00/hr	119.00
	- JC	Correspondence with insured, O. Taitz, regarding preparation of objections to her deposition and preparation of potential motion for protective order.	0.20 170.00/hr	34.00
	- MLC	Begin preparing documents to be used on the Record on Appeal.	2.30 95.00/hr	218.50
	- JC	Continue analysis of complex legal issues regarding litigation as Constitutional right of petition under California anti-SLAPP law, toward drafting of portion of insured's opening brief addressing	1.10 170.00/hr	187.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
		issues in appeal from denial of anti-SLAPP motion to strike complaint.		
12/5/2011	- JC	Continue drafting of lengthy portion of opening brief by insured, O. Taitz, in appeal from denial of anti-SLAPP motion to strike Plaintiffs' complaint, regarding insured's burden to show acts in furtherance of First Amendment rights.	1.20 170.00/hr	204.00
	- KS	Preparation of amendments to brief.	0.80 170.00/hr	136.00
12/6/2011	- JC	Lengthy telephone conference with E. Chang, counsel for defendant Intelius Corporation, regarding motion to compel deposition of insured, O. Taitz.	0.40 170.00/hr	68.00
	- JC	Correspondence with adjuster Laurie Johnson regarding potential motion by defendant Intelius Corporation, to compel deposition of insured, O. Taitz. and development of related litigation strategy.	0.20 170.00/hr	34.00
	- KS	Correspondence from client regarding protective order.	0.20 170.00/hr	34.00
	- JC	Begin analysis of complex legal issues regarding plaintiffs' burden of pleading sufficient complaint as against anti-SLAPP motion to strike, and related federal law regarding amendment of complaint, toward drafting of related portion of insured's opening brief in appeal from denial of anti-SLAPP motion to strike complaint.	0.60 170.00/hr	102.00
	- JC	Begin drafting of portion of insured, O. Taitz's opening brief addressing her and defendant, Defend Our Freedoms Foundation's conduct regarding public issues, and development of related statement of facts with reference to record on appeal, in appeal from denial of anti-SLAPP motion to strike complaint.	1.10 170.00/hr	187.00
	- KS	Correspondence with carrier regarding client's request for authority for protective order.	0.20 170.00/hr	34.00
12/7/2011	- KS	Authority from adjuster, Laurie Johnson, for Motion for Protective Order.	0.10 170.00/hr	17.00
	- JC	Begin drafting of request to court for leave to file motion for protective order regarding deposition of insured, O. Taitz, as noticed by defendant, Intelius Corporation, pursuant to carrier authority from Laurie Johnson.	0.40 170.00/hr	68.00
	- JC	Continue evaluation of legal standards for dismissal of defamation claim against public figure, including plaintiff P. Berg, and review and analysis of insured, O. Taitz's motion to dismiss raising defense regarding public figure defamation, toward	0.80 170.00/hr	136.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	drafting of insured's opening brief in appeal from denial of anti-SLAPP motion to strike complaint.		
12/7/2011 - JC	Begin review and analysis of defendant, Daylight Corporation's 24 page reply Memorandum of Points and Authorities supporting its motion to dismiss first amended complaint, including evaluation of portions addressing alleged liability of insured, Y. Taitz, as employee of Daylight Corporation.	0.70 170.00/hr	119.00
-	[REDACTED]		
- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of motion for protective order regarding insured's deposition.	0.30 170.00/hr	51.00
12/8/2011 - JC	Continue evaluation of legal standards regarding motion for protective order regarding deposition of insured, O. Taitz, and toward preparation of request to court for leave to file motion, pursuant to carrier authority from Laurie Johnson.	0.90 170.00/hr	153.00
-	[REDACTED]		
- JC	Begin drafting of portion of insured, O. Taitz's opening brief addressing her and defendant, Defend Our Freedoms Foundation's conduct regarding statements in official proceedings (CCP section 425.16(e)(1)), in appeal from denial of anti-SLAPP motion to strike complaint.	0.90 170.00/hr	153.00
-	[REDACTED]		
- JC	Finalize drafting of request to court for leave to file motion for protective order regarding deposition of insured, O. Taitz, as noticed by defendant, Intelius Corporation, pursuant to carrier authority from Laurie Johnson.	0.30 170.00/hr	51.00
-	[REDACTED]		

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/8/2011	- JC	Continue drafting of portion of insured, O. Taitz's opening brief addressing her and defendant, Defend Our Freedoms Foundation's conduct regarding public issues, and development of related statement of facts with reference to record on appeal, in appeal from denial of anti-SLAPP motion to strike complaint.	1.90 170.00/hr 323.00
	- MLC	Correspondence to all counsel and Judge Guilford regarding request to file a Motion for Protective Order Preventing Deposition of Orly Taitz.	0.10 95.00/hr 9.50
	- JC	Begin drafting of portion of insured, O. Taitz's opening brief addressing her and defendant, Defend Our Freedoms Foundation's conduct regarding their free speech activities in public forum (CCP section 425.16(e)(3)), in appeal from denial of anti-SLAPP motion to strike complaint.	1.20 170.00/hr 204.00
12/9/2011	- JC	Multiple telephone conferences with counsel for defendant Intelius, E. Chang, regarding insured, O. Taitz's objections to notice of her deposition, her pending request for leave to file a motion for protective order, and potential need for ex-parte application for continuance of deposition.	0.30 170.00/hr 51.00
	- JC	Begin drafting of portion of insured, O. Taitz's opening brief addressing her and defendant, Defend Our Freedoms Foundation's conduct regarding statements in public forum (CCP section 425.16(e)(3), in appeal from denial of anti-SLAPP motion to strike complaint.	1.20 170.00/hr 204.00
	- JC	Begin drafting of portion of insured, O. Taitz's opening brief addressing her and defendant, Defend Our Freedoms Foundation's conduct regarding right of petition regarding public issue (CCP section 425.16(e)(4), in appeal from denial of anti-SLAPP motion to strike complaint.	1.80 170.00/hr 306.00
	- JC	Correspondence with insured, O. Taitz, regarding drafting of portion of her opening brief and that of defendant, Defend Our Freedoms Foundation, represented by O. Taitz, regarding appellants' burden under anti-SLAPP statute in appeal from denial of anti-SLAPP motion to strike.	0.20 170.00/hr 34.00
	- JC	Multiple correspondence with counsel for defendant Intelius, E. Chang, regarding insured, O. Taitz's objections to notice of her deposition, her pending request for leave to file a motion for protective order, and potential need for ex-parte application for continuance of deposition.	0.30 170.00/hr 51.00
	- JC	Begin evaluation of complex legal issues regarding plaintiff P. Berg as public figure under controlling defamation law, as presented by insured O. Taitz in District Court, toward drafting of insured's opening brief in appeal from denial of insured's anti-SLAPP motion to strike and toward evaluation of plaintiffs' waiver on appeal counter arguments.	0.50 170.00/hr 85.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/9/2011	- JC	Continue drafting of portion of insured, O. Taitz's opening brief addressing her and defendant, Defend Our Freedoms Foundation's conduct regarding statements in official proceedings (CCP section 425.16(e)(1)), in appeal from denial of anti-SLAPP motion to strike complaint.	1.50 170.00/hr	255.00
	- MLC	Correspondence to the District Court clerk regarding the Court's issuance of a tentative ruling prior to the final ruling on June 14, 2011, denying Orly Taitz' and DOFF's Motion to Dismiss, in anticipation of filing our opening brief.	0.10 95.00/hr	9.50
	- JC	Begin drafting of portion of insured, O. Taitz's opening brief addressing her and defendant, Defend Our Freedoms Foundation's conduct regarding statements in judicial proceeding (CCP section 425.16(e)(2)), in appeal from denial of anti-SLAPP motion to strike complaint.	1.70 170.00/hr	289.00
12/12/2011	- JC	Begin review and analysis of court's seven page tentative ruling on insured, O. Taitz's anti-SLAPP motion to strike complaint, and other related motions, toward potential inclusion in excerpts of record on appeal supporting appeal from denial of anti-SLAPP motion.	0.60 170.00/hr	102.00
	- JC	Continue drafting of portion of insured, O. Taitz's opening brief addressing her and defendant, Defend Our Freedoms Foundation's conduct regarding statements in public forum (CCP section 425.16(e)(3), in appeal from denial of anti-SLAPP motion to strike complaint.	0.60 170.00/hr	102.00
	- JC	Continue drafting of portion of insured, O. Taitz's opening brief addressing sufficiency of plaintiffs' complaint and plaintiffs' burden to submit sufficient evidence supporting complaint (CCP section 425.16(b)(1), in appeal from denial of anti-SLAPP motion to strike complaint.	0.70 170.00/hr	119.00
	- JC	Receipt and review 12/12/11 correspondence of counsel for defendant, Intelius, regarding postponement of its deposition of insured, O. Taitz.	0.20 170.00/hr	34.00
	- JC	Continue review and analysis of voluminous lower court filings toward preparation of excerpts of record on appeal supporting opening brief of insured, O. Taitz, in appeal from denial of insured's and defendant, Defend Our Freedoms Foundation's anti-SLAPP motion to strike complaint.	1.40 170.00/hr	238.00
	- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of voluminous record on appeal in insured's and defendant, Defend Our Freedoms Foundation's appeal from denial of anti-SLAPP motion to strike plaintiffs' complaint.	0.30 170.00/hr	51.00
	- JC	Begin drafting of portion of insured, O. Taitz's opening brief addressing sufficiency of plaintiffs' complaint and plaintiffs' burden to submit sufficient evidence supporting complaint (CCP	1.80 170.00/hr	306.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	section 425.16(b)(1), in appeal from denial of anti-SLAPP motion to strike complaint.		
12/12/2011 - JC	Begin evaluation of complex legal issues regarding proper standards of review on appeal regarding insured, O. Taitz's evidentiary objections in District Court, and overruling of objection, toward drafting of related portion of insured's opening brief in appeal from denial of insured's anti-SLAPP motion to strike.	1.40 170.00/hr	238.00
- JC	Continue drafting of portion of insured, O. Taitz's opening brief addressing her and defendant, Defend Our Freedoms Foundation's conduct regarding statements in judicial proceeding (CCP section 425.16(e)(2)), in appeal from denial of anti-SLAPP motion to strike complaint.	0.60 170.00/hr	102.00
12/13/2011 - JC	Continue drafting of request for judicial notice supporting opening brief of insured, O. Taitz, in appeal from denial of insured's and defendant, Defend Our Freedoms Foundation's anti-SLAPP motion to strike.	0.50 170.00/hr	85.00
- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of opening brief in appeal from denial of anti-SLAPP motion to strike.	0.50 170.00/hr	85.00
- JC	Continue drafting of portion of insured, O. Taitz's opening brief addressing sufficiency of plaintiffs' complaint and plaintiffs' burden to submit sufficient evidence supporting complaint (CCP section 425.16(b)(1), in appeal from denial of anti-SLAPP motion to strike complaint.	1.50 170.00/hr	255.00
- MLC	Review 9th Circuit Appellate Rules and Procedures in anticipation of filing opening Appellant's Brief.	0.60 95.00/hr	57.00
- JC	Continue drafting of portion of insured, O. Taitz's opening brief addressing her and defendant, Defend Our Freedoms Foundation's conduct regarding statements in public forum (CCP section 425.16(e)(3), in appeal from denial of anti-SLAPP motion to strike complaint.	0.90 170.00/hr	153.00
- JC	Continue drafting of portion of insured, O. Taitz's opening brief addressing her and defendant, Defend Our Freedoms Foundation's conduct regarding statements in judicial proceeding (CCP section 425.16(e)(2)), in appeal from denial of anti-SLAPP motion to strike complaint.	1.10 170.00/hr	187.00
- JC	Begin evaluation of complex legal issues toward development of federal Communications Decency Act arguments in opening brief of insured, O. Taitz, in appeal from denial of anti-SLAPP motion to strike complaint.	1.50 170.00/hr	255.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/14/2011	- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of joint excerpts of record in appeals by insured and defendant, Defend Our Freedoms Foundations (represented by insured), regarding appeals from denial of joint anti-SLAPP motion to strike complaint.	0.30 170.00/hr	51.00
	- JC	Receipt and review multiple correspondence between opposing counsel and counsel for Sankey defendants, regarding plaintiffs' \$35 million settlement demand, and Sankey counteroffer.	0.30 170.00/hr	51.00
	-	[REDACTED]		
	- JC	Finalize drafting of portion of insured, O. Taitz's opening brief addressing her and defendant, Defend Our Freedoms Foundation's conduct regarding statements in official proceedings (CCP section 425.16(e)(1)), in appeal from denial of anti-SLAPP motion to strike complaint.	0.70 170.00/hr	119.00
	- JC	Finalize drafting of portion of insured, O. Taitz's opening brief addressing her and defendant, Defend Our Freedoms Foundation's conduct regarding statements in judicial proceeding (CCP section 425.16(e)(2)), in appeal from denial of anti-SLAPP motion to strike complaint.	0.60 170.00/hr	102.00
	- JC	Finalize drafting of portion of insured, O. Taitz's opening brief addressing her and defendant, Defend Our Freedoms Foundation's conduct regarding statements in public forum (CCP section 425.16(e)(3), in appeal from denial of anti-SLAPP motion to strike complaint.	0.90 170.00/hr	153.00
	- JC	Continue drafting of portion of insured, O. Taitz's opening brief addressing her and defendant, Defend Our Freedoms Foundation's conduct regarding statements in official proceedings (CCP section 425.16(e)(1)), in appeal from denial of anti-SLAPP motion to strike complaint.	1.50 170.00/hr	255.00
	- KS	Telephone call from client regarding appeal.	0.10 170.00/hr	17.00
	- JC	Continue evaluation of complex legal issues regarding applicable standards of appellate review as to numerous legal issues raised in appeal of insured, O. Taitz, from denial of anti-SLAPP motion to strike complaint, and toward drafting of portions of opening brief addressing such standards, in compliance with Ninth Circuit rules.	1.90 170.00/hr	323.00
	- JC	Continue drafting of portion of insured, O. Taitz's opening brief addressing admissibility of plaintiffs' evidence in opposition to insured's anti-SLAPP motion to strike complaint, and application	0.80 170.00/hr	136.00

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		Hrs/Rate	Amount
	of federal rules of evidence, in appeal from denial of anti-SLAPP motion.		
12/14/2011	JC Correspondence with opposing counsel for defendant, Intelius Inc., regarding deposition of insured, O. Taitz.	0.20 170.00/hr	34.00
	- JC Continue drafting of portion of insured, O. Taitz's opening brief addressing her and defendant, Defend Our Freedoms Foundation's conduct regarding statements in public forum (CCP section 425.16(e)(3), in appeal from denial of anti-SLAPP motion to strike complaint.	0.90 170.00/hr	153.00
12/15/2011	JC Begin review and analysis of draft opening brief by defendant, Defend Our Freedoms Foundations, represented by insured, O. Taitz, toward coordination of opening briefs by insured and Defend Our Freedoms in related appeals from denial of their joint anti-SLAPP motion to strike complaint.	1.20 170.00/hr	204.00
	- MLC Prepare documents to be used in the Excerpt of Record on Appeal by Orly Taitz (approximately 350 pages)	2.90 95.00/hr	275.50
	- KS Correspondence with client regarding Appeal.	0.40 170.00/hr	68.00
	- JC Continue preparation of voluminous excerpts of record in appeal by insured, O. Taitz, from denial of anti-SLAPP motion to strike complaint.	1.70 170.00/hr	289.00
	- KS Conference regarding client's multiple requests related to the appeal.	0.80 170.00/hr	136.00
	- KS Telephone call with carrier regarding client's requests.	0.30 170.00/hr	51.00
	- KS Multiple telephone calls with client regarding appeal.	0.60 170.00/hr	102.00
	- JC Multiple correspondence and telephone conferences with insured, O. Taitz, regarding preparation of opening briefs by her and defendant, Defend Our Freedoms Foundations, represented by insured, in related appeals from denial of joint anti-SLAPP motion to strike complaint.	0.80 170.00/hr	136.00
-	[REDACTED]		
	- JC Begin drafting lengthy revisions to opening brief by insured, O. Taitz, based on proposed opening brief of defendant, Defend Our Freedoms Foundations, represented by insured, toward coordination of opening briefs and supporting legal arguments by insured and Defend Our Freedoms in related appeals from denial of their joint anti-SLAPP motion to strike complaint.	2.40 170.00/hr	408.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
12/15/2011	- KS	Conference regarding court order agreeing to our proposed order.	0.20 170.00/hr	34.00
	- JC	Begin review and analysis of court's 12/14/11 order on insured, O. Taitz's requests for leave to file motion for clarification of stay, pursuant to carrier authority (adjuster Laurie Johnson) regarding deposition of insured noticed by defendant, Intelius.	0.30 170.00/hr	51.00
	- JC	Multiple correspondence with insured, O. Taitz, regarding analysis of court's 12/14/11 order on insured's requests for leave to file motion for clarification of stay, regarding deposition of insured noticed by defendant, Intelius.	0.30 170.00/hr	51.00
	- JC	Multiple correspondence with opposing counsel for defendant, Intelius, regarding court's 12/14/11 order on insured, O. Taitz's requests for leave to file motion for clarification of stay, regarding deposition of insured noticed by Intelius.	0.30 170.00/hr	51.00
12/16/2011	- JC	Continue drafting of request for judicial notice by insured, O. Taitz, in support of opening brief in appeal from denial of anti-SLAPP motion to strike complaint.	1.20 170.00/hr	204.00
	- JC	Lengthy meeting with insured, O. Taitz, regarding drafting and coordination of opening briefs of insured and defendant, Defend Our Freedoms Foundation, represented by insured, in related appeals from denial of joint anti-SLAPP motion to strike complaint.	2.10 170.00/hr	357.00
	- JC	Continue drafting of lengthy portion of opening brief of insured, O. Taitz, regarding legal sufficiency of each of plaintiffs' causes of action in appeal from denial of joint anti-SLAPP motion to strike complaint.	4.50 170.00/hr	765.00
	- MLC	Preparation of Table of Authorities and Table of Contents for Opening Brief by Orly Taitz.	1.90 95.00/hr	180.50
	- JC	Finalize drafting of lengthy (36 page) opening brief of insured, O. Taitz, in appeal from denial of anti-SLAPP motion to strike complaint.	0.60 170.00/hr	102.00
	- KS	Analyze Opening Brief.	2.80 170.00/hr	476.00
12/17/2011	- JC	Continue review and attorney analysis of lengthy (25 page) reply Memorandum of Points and Authorities of defendant, Daylight Corporation, pursuant to carrier authority (adjuster Laurie Johnson) toward preparation for hearing on motion.	0.80 170.00/hr	136.00
12/19/2011	- MLC	Review and revise Request for judicial Notice by Orly Taitz, to be filed with Appellant's Opening Brief.	0.20 95.00/hr	19.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/19/2011	- JC	Finalize drafting of request for judicial notice by insured, O. Taitz, in support of opening brief in appeal from denial of anti-SLAPP motion to strike complaint.	0.60 170.00/hr	102.00
	- JC	Multiple correspondence and telephone conferences with insured, O. Taitz, regarding drafting and coordination of opening briefs of insured and defendant, Defend Our Freedoms Foundation, represented by insured, in related appeals from denial of joint anti-SLAPP motion to strike complaint.	0.50 170.00/hr	85.00
	-	[REDACTED]		
	-	[REDACTED]		
	-	[REDACTED]		
	-	[REDACTED]		
	- JC	Begin review and analysis of proposed declaration of insured, O. Taitz, as submitted by defendant, Intelius Corporation, pursuant to carrier authority (adjuster Laurie Johnson) in support of its motion for summary judgment on amended complaint.	0.50 170.00/hr	85.00
	- JC	Telephone conference with insured, O. Taitz, regarding preparation of potential motion to impose sanctions against all plaintiffs.	0.20 170.00/hr	34.00
	- JC	Receipt and review notice of continuance of trial in Pennsylvania State Bar disciplinary proceeding against plaintiff, P. Berg, counsel for all plaintiffs, regarding potential disbarment of plaintiffs' counsel.	0.30 170.00/hr	51.00
12/20/2011	-	[REDACTED]		
	- JC	Multiple correspondence with counsel for defendant, Intelius, regarding proposed declaration of insured, O. Taitz, pursuant to carrier authority (adjuster Laurie Johnson) supporting Intelius' motion for summary judgment and suggestions for revisions to declaration.	0.30 170.00/hr	51.00
	- JC	Begin review and analysis of lengthy opening brief (36 pages) by defendant, Defend Our Freedoms Foundations, represented by insured, O. Taitz, in appeals by insured and Defend Our Freedoms Foundations from denial of joint anti-SLAPP motion to strike complaint.	0.50 170.00/hr	85.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/20/2011	- KS	Conference regarding appeal.	0.30 170.00/hr	51.00
	- KS	Conference regarding regarding court ruling.	0.20 170.00/hr	34.00
12/21/2011	- KS	Correspondence with court regarding appeal.	0.20 170.00/hr	34.00
	- JC	Multiple correspondence with insured, O. Taitz, regarding necessary corrections to appellate brief drafted by her, as counsel for defendant Defend Our Freedoms Foundations, in appeal by insured and Defend Our Freedoms from denial of joint anti-SLAPP motion to strike complaint.	0.30 170.00/hr	51.00
	- JC	Multiple correspondence with insured, O. Taitz, regarding potential claims against plaintiffs and evaluation of claims as compulsory or permissive counterclaims in pending case.	0.30 170.00/hr	51.00
	- JC	Begin drafting of update for carrier with attorney analysis regarding pending appeals, discovery, stay of portions of case, potential attorney fees motion, and other future handling issues.	0.60 170.00/hr	102.00
	- JC	Review notices of deficient filing from court of appeal regarding appeal by defendant Defend Our Freedoms Foundations, represented by insured, O. Taitz, in appeal by insured and Defend Our Freedoms from denial of joint anti-SLAPP motion to strike complaint.	0.20 170.00/hr	34.00
	- KS	Conference regarding Notice from Court of Appeals.	0.20 170.00/hr	34.00
	- JC	Continue review and analysis of lengthy opening brief (36 pages) by defendant, Defend Our Freedoms Foundations, represented by insured, O. Taitz, in appeals by insured and Defend Our Freedoms Foundations from denial of joint anti-SLAPP motion to strike complaint.	1.20 170.00/hr	204.00
	- KS	Conference regarding "corporate disclosure statement".	0.20 170.00/hr	34.00
12/22/2011	- JC	Begin review of lengthy (30 page) opinion of Court of Appeals in Drake v. Obama case, toward evaluation of effect on appeals by insured, O. Taitz and defendant, Defend Our Freedoms Foundations (represented by insured), including on public issue element of anti-SLAPP statute, in appeals from denial of insured's anti-SLAPP motion to strike complaint.	0.40 170.00/hr	68.00
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/23/2011	-	[REDACTED]		
		[REDACTED]		
	-	JC Continue review of lengthy (30 page) opinion of Court of Appeals in Drake v. Obama case, toward evaluation of effect on appeals by insured, O. Taitz and defendant, Defend Our Freedoms Foundations (represented by insured), including on public issue element of anti-SLAPP statute, in appeals from denial of insured's anti-SLAPP motion to strike complaint.	1.20 170.00/hr	204.00
	-	[REDACTED]		
		[REDACTED]		
12/24/2011	-	KS Preparation of update to carrier.	0.10 170.00/hr	17.00
12/27/2011	-	JC Multiple correspondence with E. Chang, counsel for defendant, Intelius Corporation, regarding proposed declaration of insured, O. Taitz, as prepared by insured, supporting motion for summary judgment of Intelius.	0.50 170.00/hr	85.00
	-	JC Begin review and attorney analysis of proposed declaration of insured, O. Taitz, as prepared by insured, supporting motion for summary judgment of defendant, Intelius Corporation.	0.40 170.00/hr	68.00
	-	JC Multiple correspondence with insured, O. Taitz, regarding her proposed declaration supporting motion for summary judgment by defendant, Intelius Corporation, and toward finalization of declaration.	0.30 170.00/hr	51.00
	-	[REDACTED]		
		[REDACTED]		
	-	[REDACTED]		
		[REDACTED]		
1/1/2012	-	JC Begin attorney analysis of legal authorities cited by plaintiffs in meet and confer correspondence regarding motion to dismiss insured, O. Taitz's appeal, and toward preparation of response to meet and confer correspondence.	0.60 170.00/hr	102.00
	-	JC Correspondence with insured, O. Taitz, regarding plaintiffs' proposed motion to dismiss appeal and toward preparation of response to meet and confer correspondence.	0.30 170.00/hr	51.00
	-	JC Meet and confer correspondence with opposing counsel regarding plaintiffs' proposed motion to dismiss appeal.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/2/2012 -	JC	Correspondence with opposing counsel for defendant, Intelius, regarding proposed revisions by insured, O. Taitz, to her proposed declaration supporting Intelius' motion for summary judgment, pursuant to carrier authority from adjuster Laurie Johnson.	0.20 170.00/hr	34.00
-	JC	Telephone conference with insured, O. Taitz, regarding preparation of her response to plaintiffs' meet and confer correspondence regarding proposed motion to strike insured's opening brief in her appeal.	0.20 170.00/hr	34.00
1/3/2012 -	JC	Multiple correspondence with insured, O. Taitz, regarding her revised proposed declaration supporting motion for summary judgment by defendant, Intelius, pursuant to carrier authority from adjuster Laurie Johnson.	0.30 170.00/hr	51.00
-	JC	Review opposing counsel's 1/2/12 meet and confer correspondence to defendant, Defend Our Freedoms Foundations (represented by insured, O. Taitz), regarding motion to dismiss defendant's appeal, and toward preparation of response in related appeals by such defendant and insured.	0.30 170.00/hr	51.00
-	JC	Multiple correspondence with insured, O. Taitz, regarding preparation of her response to plaintiffs' meet and confer correspondence regarding proposed motion to strike insured's opening brief in her appeal.	0.30 170.00/hr	51.00
-	JC	Begin drafting response by insured, O. Taitz, to meet and confer correspondence of plaintiffs regarding their proposed motion to dismiss insured's appeal from denial of her and defendant, Defend Our Freedoms Foundations, appeal from denial of joint anti-SLAPP motion to dismiss complaint.	0.70 170.00/hr	119.00
-	JC	Begin review of revised proposed declaration of insured, O. Taitz, prepared by defendant, Intelius, supporting Intelius' motion for summary judgment, pursuant to carrier authority from adjuster Laurie Johnson.	0.30 170.00/hr	51.00
1/4/2012 -		[REDACTED]		
-		[REDACTED]		
-		[REDACTED]		
-		[REDACTED]		
-	JC	Begin review of declaration of defendant, N. Sankey, supporting motion for summary judgment of defendant, Intelius, and toward drafting of revisions to proposed declaration of insured, O. Taitz,	0.40 170.00/hr	68.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	requested by Intelius in lieu of insured's deposition, pursuant to carrier authority from adjuster Laurie Johnson.		
1/4/2012 - JC	Begin review of declaration of defendant, T. Sankey, supporting motion for summary judgment of defendant, Intelius, and toward drafting of revisions to proposed declaration of insured, O. Taitz, requested by Intelius in lieu of insured's deposition, pursuant to carrier authority from adjuster Laurie Johnson.	0.30 170.00/hr	51.00
- JC	Multiple correspondence with insured, O. Taitz, regarding declarations of defendants, T. and N. Sankey, supporting motion for summary judgment of defendant, Intelius, and toward drafting of revisions to proposed declaration of insured, O. Taitz, requested by Intelius in lieu of insured's deposition, pursuant to carrier authority from adjuster Laurie Johnson.	0.30 170.00/hr	51.00
- JC	Multiple correspondence with counsel for defendant, Intelius, regarding its proposed declaration for insured, O. Taitz, supporting its motion for summary judgment and toward drafting of revisions to proposed declaration of insured requested by Intelius in lieu of insured's deposition, pursuant to carrier authority from adjuster Laurie Johnson.	0.30 170.00/hr	51.00
- JC	Multiple correspondence with insured, O. Taitz (counsel for defendant, Defend Our Freedoms Foundations), toward drafting coordinated response to plaintiffs' meet and confer correspondence regarding proposed motions to dismiss appeals by insured and DOFF in appeal from joint anti-SLAPP motion to dismiss complaint, pursuant to carrier authority from adjuster Laurie Johnson.	0.40 170.00/hr	68.00
- JC	Receipt and review notice of electronic filing and notice of lodging regarding proposed judgment for defendant, Daylight Chemical Systems Inc.	0.20 170.00/hr	34.00
- JC	Receipt and review proposed judgment for defendant, Daylight Chemical Systems Inc.	0.20 170.00/hr	34.00
1/5/2012 -	[REDACTED]		
-	[REDACTED]		
-	[REDACTED]		
- JC	Multiple correspondence with counsel for defendant, Intelius Corporation, regarding exhibits to declaration of insured, O. Taitz, supporting Intelius' motion for summary judgment and revisions to such declaration requested by Intelius in lieu of	0.30 170.00/hr	51.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	insured's deposition, pursuant to carrier authority from adjuster Laurie Johnson.		
	.		
1/5/2012 -	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
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	[REDACTED]		
-	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
-	JC Multiple correspondence with counsel for defendant, Intelius, regarding revised proposed declaration for insured, O. Taitz, supporting its motion for summary judgment and toward drafting of revisions to proposed declaration requested by Intelius in lieu of insured's deposition, pursuant to carrier authority from adjuster Laurie Johnson.	0.30 170.00/hr	51.00
-	JC Begin review and analysis of proposed revised declaration for insured, O. Taitz, supporting its motion for summary judgment of defendant, Intelius, toward drafting of revisions to proposed declaration of insured requested by Intelius in lieu of insured's deposition, pursuant to carrier authority from adjuster Laurie Johnson.	0.30 170.00/hr	51.00
-	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/9/2012	- KS	Conference regarding future handling.	0.60 170.00/hr	102.00
	- JC	Review correspondence of opposing counsel for defendant, Intelius Corporation, to court requesting leave to file motion for summary judgment.	0.30 170.00/hr	51.00
	- JC	Multiple correspondence with counsel for defendant, Intelius, regarding revised proposed declaration for insured, O. Taitz, supporting its motion for summary judgment and toward drafting of revisions to proposed declaration requested by Intelius in lieu of insured's deposition, pursuant to carrier authority from adjuster Laurie Johnson.	0.30 170.00/hr	51.00
1/10/2012	- JC	Review proof of service documents preparation by insured, O. Taitz, as counsel for defendant, Defend Our Freedoms Foundations, regarding preparation of coordinated opposition to Appellees' motions to dismiss appeals by O. Taitz and Defend Our Freedoms Foundations from denial of joint anti-SLAPP motion to strike complaint.	0.30 170.00/hr	51.00
	- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of coordinated opposition to Appellees' motions to dismiss appeals by O. Taitz and defendant, Defend Our Freedoms Foundations (represented by insured), from denial of joint anti-SLAPP motion to strike complaint.	0.30 170.00/hr	51.00
	- JC	Correspondence with counsel for defendant, Intelius, regarding final revisions to declaration for insured, O. Taitz, supporting its motion for summary judgment requested by Intelius in lieu of insured's deposition, pursuant to carrier authority from adjuster Laurie Johnson.	0.20 170.00/hr	34.00
1/11/2012	- KS	Finalize update to carrier.	0.60 170.00/hr	102.00
	- KS	Notice from Court regarding filings.	0.10 170.00/hr	17.00
	- JC	Receipt and review judgment entered for defendant, Daylight Chemical Systems, Inc., pursuant to its motion to dismiss, and related notice of electronic filing from Court.	0.30 170.00/hr	51.00
1/13/2012	- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of response to plaintiffs' opposition to insured's request for judicial notice, in insured's appeal from denial of her and defendant, Defend Our Freedoms Foundation's (represented by insured) joint anti-SLAPP motion to dismiss complaint.	0.30 170.00/hr	51.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
1/13/2012	- JC	Begin review of plaintiffs' joint lengthy (approximately 200 pages) motion to strike to dismiss appeal by insured, O. Taitz, from denial of her and defendant, Defend Our Freedoms Foundation's joint anti-SLAPP motion to dismiss complaint.	1.60 170.00/hr	272.00
	- JC	Begin review of plaintiffs' joint opposition Memorandum of Points and Authorities and declarations to insured, O. Taitz's request for judicial notice, in insured's appeal from denial of her and defendant, Defend Our Freedoms Foundation's joint anti-SLAPP motion to dismiss complaint.	0.70 170.00/hr	119.00
1/15/2012	- JC	Continue review of plaintiffs' joint lengthy (approximately 200 pages) motion to strike to dismiss appeal by insured, O. Taitz, from denial of her and defendant, Defend Our Freedoms Foundation's joint anti-SLAPP motion to dismiss complaint.	0.60 170.00/hr	102.00
1/17/2012	- KS	Conference regarding client's and former counsel's arguments now on appeal.	0.60 170.00/hr	102.00
	- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of oppositions to plaintiffs' motions to dismiss appeals by insured and defendant, Defend Our Freedoms Foundation (represented by insured), in related appeals from denial of joint anti-SLAPP motion to dismiss complaint.	0.30 170.00/hr	51.00
1/19/2012	- JC	Begin review and analysis of numerous cases cited under Ninth Circuit Court of Appeals Rules in plaintiffs' motion to strike and dismiss opening brief and excerpts of record of defendant, Defend Our Freedoms Foundation (represented by insured, O. Taitz), in appeals by insured and Defend Our Freedoms Foundation from denial of their joint anti-SLAPP motion to strike complaint, and toward coordinated opposition to plaintiffs' motion.	0.60 170.00/hr	102.00
	- JC	Begin review and analysis of lengthy portion of plaintiffs' motion under FRAP Rule 10 to strike and dismiss opening brief and excerpts of record of defendant, Defend Our Freedoms Foundation (represented by insured, O. Taitz), in appeals by insured and Defend Our Freedoms Foundation from denial of their joint anti-SLAPP motion to strike complaint, and toward coordinated opposition to plaintiffs' motion.	0.60 170.00/hr	102.00
	- JC	Begin review and analysis of lengthy portion of plaintiffs' motion under FRAP Rule 28 to strike and dismiss opening brief and excerpts of record of defendant, Defend Our Freedoms Foundation (represented by insured, O. Taitz), in appeals by insured and Defend Our Freedoms Foundation from denial of their joint anti-SLAPP motion to strike complaint, and toward coordinated opposition to plaintiffs' motion.	0.50 170.00/hr	85.00
	- JC	Begin review and analysis of numerous cases cited under FRAP Rule 10 in plaintiffs' motion to strike and dismiss opening brief and excerpts of record of defendant, Defend Our Freedoms Foundation (represented by insured, O. Taitz), in appeals by	0.70 170.00/hr	119.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	insured and Defend Our Freedoms Foundation from denial of their joint anti-SLAPP motion to strike complaint, and toward coordinated opposition to plaintiffs' motion.		
1/19/2012 - JC	Begin review and analysis of numerous cases cited under FRAP Rule 28 in plaintiffs' motion to strike and dismiss opening brief and excerpts of record of defendant, Defend Our Freedoms Foundation (represented by insured, O. Taitz), in appeals by insured and Defend Our Freedoms Foundation from denial of their joint anti-SLAPP motion to strike complaint, and toward coordinated opposition to plaintiffs' motion.	0.80 170.00/hr	136.00
1/20/2012 - KS	Telephone call with client regarding opposition to Motion to Dismiss.	0.20 170.00/hr	34.00
- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of oppositions to plaintiffs' motions to dismiss appeals by insured and defendant, Defend Our Freedoms Foundation (represented by insured), in related appeals from denial of joint anti-SLAPP motion to dismiss complaint.	0.30 170.00/hr	51.00
- JC	Continue review and analysis of numerous cases cited under FRAP Rule 10 in plaintiffs' motion to strike and dismiss opening brief and excerpts of record of defendant, Defend Our Freedoms Foundation (represented by insured, O. Taitz), in appeals by insured and Defend Our Freedoms Foundation from denial of their joint anti-SLAPP motion to strike complaint, and toward coordinated opposition to plaintiffs' motion.	0.70 170.00/hr	119.00
- JC	Begin review and analysis of numerous cases cited under FRAP Rule 28 in plaintiffs' motion to strike and dismiss opening brief and excerpts of record of defendant, Defend Our Freedoms Foundation (represented by insured, O. Taitz), in appeals by insured and Defend Our Freedoms Foundation from denial of their joint anti-SLAPP motion to strike complaint, and toward coordinated opposition to plaintiffs' motion.	1.10 170.00/hr	187.00
- KS	Authority from carrier, Laurie Johnson, regarding Motion for Sanctions.	0.10 170.00/hr	17.00
- KS	Conference regarding client's request for sanctions Motion.	0.30 170.00/hr	51.00
- JC	Begin drafting of lengthy portion of opposition of insured, O. Taitz, regarding plaintiffs' motion to dismiss appeal regarding plaintiffs' complex legal arguments based on FRAP 10 and related authorities, in appeal from denial of anti-SLAPP motion to dismiss complaint.	1.40 170.00/hr	238.00
- JC	Begin review and analysis of lengthy portion of plaintiffs' motion under Ninth Circuit Court of Appeals Rules to strike and dismiss opening brief and excerpts of record of defendant, Defend Our Freedoms Foundation (represented by insured, O. Taitz), in	0.70 170.00/hr	119.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	appeals by insured and Defend Our Freedoms Foundation from denial of their joint anti-SLAPP motion to strike complaint, and toward coordinated opposition to plaintiffs' motion.		
1/20/2012 - JC	Begin drafting of lengthy portion of opposition of insured, O. Taitz, to plaintiffs' motion to dismiss appeal regarding plaintiffs' complex legal arguments based on FRAP 28 and related authorities, in appeal from denial of anti-SLAPP motion to dismiss complaint.	1.10 170.00/hr	187.00
1/21/2012 - JC	Begin drafting of declaration and supporting exhibits supporting opposition of insured, O. Taitz, to plaintiffs' motion to dismiss appeal and strike opening brief and record on appeal, in appeal from denial of anti-SLAPP motion to dismiss complaint, pursuant to carrier authority from Laurie Johnson.	0.50 170.00/hr	85.00
- JC	Begin drafting of lengthy portion of opposition of insured, O. Taitz, to plaintiffs' motion to dismiss appeal regarding plaintiffs' complex legal arguments based on FRAP 10 and related authorities, in appeal from denial of anti-SLAPP motion to dismiss complaint, pursuant to carrier authority from Laurie Johnson.	0.60 170.00/hr	102.00
- JC	Continue drafting of lengthy portion of opposition of insured, O. Taitz, to plaintiffs' motion to dismiss appeal regarding plaintiffs' complex legal arguments based on FRAP 28 and related authorities, in appeal from denial of anti-SLAPP motion to dismiss complaint, pursuant to carrier authority from Laurie Johnson.	1.20 170.00/hr	204.00
- JC	Begin drafting of opposition Memorandum of Points and Authorities of insured, O. Taitz, to plaintiffs' motion to strike insured's request for judicial notice, in appeal from denial of anti-SLAPP motion to dismiss complaint, pursuant to carrier authority from Laurie Johnson.	0.50 170.00/hr	85.00
- JC	Continue review and analysis of numerous cases cited under Ninth Circuit Court of Appeals Rules and related authority in plaintiffs' motion to strike and dismiss opening brief and excerpts of record of defendant, Defend Our Freedoms Foundation (represented by insured, O. Taitz), in appeals by insured and Defend Our Freedoms Foundation from denial of their joint anti-SLAPP motion to strike complaint, and toward coordinated opposition to plaintiffs' motion.	0.50 170.00/hr	85.00
- JC	Continue drafting of lengthy portion of opposition of insured, O. Taitz, to plaintiffs' motion to dismiss appeal regarding plaintiffs' complex legal arguments based on Ninth Circuit Court of Appeals Rules and related authorities, in appeal from denial of anti-SLAPP motion to dismiss complaint, pursuant to carrier authority from Laurie Johnson.	0.80 170.00/hr	136.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/21/2012	- JC	Continue review and analysis of numerous cases cited under FRAP Rule 10 in plaintiffs' motion to strike and dismiss opening brief and excerpts of record of defendant, Defend Our Freedoms Foundation (represented by insured, O. Taitz), in appeals by insured and Defend Our Freedoms Foundation from denial of their joint anti-SLAPP motion to strike complaint, and toward coordinated opposition to plaintiffs' motion.	0.70 170.00/hr	119.00
	- JC	Begin review and analysis of numerous cases cited under FRAP Rule 28 and related authorities in plaintiffs' motion to strike and dismiss opening brief and excerpts of record of defendant, Defend Our Freedoms Foundation (represented by insured, O. Taitz), in appeals by insured and Defend Our Freedoms Foundation from denial of their joint anti-SLAPP motion to strike complaint, and toward coordinated opposition to plaintiffs' motion.	0.60 170.00/hr	102.00
1/22/2012	- JC	Begin review and analysis of motion by appellant, Defend Our Freedoms Foundation (represented by insured, O. Taitz), to extend time to oppose plaintiffs' motion to dismiss appeal by Defend Our Freedoms, regarding joint appeals by insured and Defend Our Freedoms from denial of joint anti-SLAPP motion to dismiss complaint.	0.30 170.00/hr	51.00
	- JC	Begin review and analysis of opposition brief by all appellees to motion by appellant, Defend Our Freedoms Foundation (represented by insured, O. Taitz), to extend time to oppose plaintiffs' motion to dismiss appeal by Defend Our Freedoms, regarding joint appeals by insured and Defend Our Freedoms from denial of joint anti-SLAPP motion to dismiss complaint, and regarding further alleged defamation of appellees by insured.	0.70 170.00/hr	119.00
	- JC	Continue drafting of opposition Memorandum of Points and Authorities of insured, O. Taitz, to plaintiffs' motion to strike insured's request for judicial notice, in appeal from denial of anti-SLAPP motion to dismiss complaint, pursuant to carrier authority from Laurie Johnson.	0.40 170.00/hr	68.00
1/23/2012	- JC	Continue drafting of lengthy portion of opposition by insured, O. Taitz, regarding complex FRAP Rule 28 legal arguments by plaintiffs in their motion to dismiss appeal by insured and defendant, Defend Our Freedoms Foundation (represented by insured), from denial of joint anti-SLAPP motion to dismiss complaint, pursuant to carrier authority from Laurie Johnson.	0.90 170.00/hr	153.00
	- MLC	Review Federal Rules for the 9th Circuit regarding requirements by Pro Se issues parties for electronic signature on Motions.	0.40 95.00/hr	38.00
	- JC	Continue drafting of lengthy portion of opposition by insured, O. Taitz, regarding complex FRAP Rule 10 legal arguments by plaintiffs in their motion to dismiss appeal by insured and defendant, Defend Our Freedoms Foundation (represented by	0.80 170.00/hr	136.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	insured), from denial of joint anti-SLAPP motion to dismiss complaint, pursuant to carrier authority from Laurie Johnson.		
1/23/2012 - JC	Continue drafting of lengthy portion of opposition by insured, O. Taitz, regarding complex Ninth Circuit Court of Appeals Rules legal arguments by plaintiffs in their motion to dismiss appeal by insured and defendant, Defend Our Freedoms Foundation (represented by insured), from denial of joint anti-SLAPP motion to dismiss complaint, pursuant to carrier authority from Laurie Johnson.	0.60 170.00/hr	102.00
- JC	Begin drafting of portion of insured, O. Taitz's opposition to plaintiffs' motion to dismiss appeal by insured and defendant, Defend Our Freedoms Foundation (represented by insured), regarding sufficiency of plaintiffs' efforts to meet and confer regarding motion, in appeal from denial of joint anti-SLAPP motion to dismiss complaint, pursuant to carrier authority from Laurie Johnson.	0.70 170.00/hr	119.00
- MLC	Review and revise Opposition by Orly Taitz to Appellees' Motion to Strike Appellant's Opening Brief and Request for Judicial Notice, and to Dismiss Appeal; Request to Strike Appellees' Unsigned Motion; and Supporting Declaration, pursuant to carrier authority from Laurie Johnson.	0.90 95.00/hr	85.50
- JC	Begin review and analysis of lengthy draft opposition brief by insured, O. Taitz (as counsel for defendant, Defend Our Freedoms Foundation), to motion by plaintiffs to dismiss appeal by Defend Our Freedoms, in appeals by insured and Defend Our Freedoms, toward preparation of coordinated oppositions by insured and Defend Our Freedoms to plaintiffs' motions to dismiss related appeals.	0.60 170.00/hr	102.00
- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of oppositions to plaintiffs' motions to dismiss appeals by insured and defendant, Defend Our Freedoms Foundation (represented by insured), in related appeals from denial of joint anti-SLAPP motion to dismiss complaint.	0.50 170.00/hr	85.00
- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of oppositions to plaintiffs' motions to dismiss appeals by insured and defendant, Defend Our Freedoms Foundation (represented by insured), in related appeals from denial of joint anti-SLAPP motion to dismiss complaint.	0.40 170.00/hr	68.00
- JC	Continue drafting of opposition Memorandum of Points and Authorities of insured, O. Taitz, to plaintiffs' motion to strike insured's request for judicial notice, in appeal from denial of anti-SLAPP motion to dismiss complaint, pursuant to carrier authority from Laurie Johnson.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/23/2012	- KS	Conference regarding client's comments and responses.	0.40 170.00/hr	68.00
	- JC	Begin drafting of lengthy portion of opposition of insured, O. Taitz, to plaintiffs' motion to dismiss appeal regarding plaintiffs' complex legal arguments based on Ninth Circuit Court of Appeals Rules and related authorities, in appeal from denial of anti-SLAPP motion to dismiss complaint, pursuant to carrier authority from Laurie Johnson.	1.80 170.00/hr	306.00
1/24/2012	- KS	Examine and analyze opposing counsel's exhibits.	0.80 170.00/hr	136.00
	- KS	Correspondence from client regarding opposing counsel's failure to properly execute appellate filings.	0.20 170.00/hr	34.00
	- KS	Correspondence with carrier regarding Appeal.	0.20 170.00/hr	34.00
1/27/2012	- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of coordinated reply Memoranda of Points and Authorities for insured and defendant, Defend Our Freedoms Foundations (represented by insured), to opposition by plaintiffs to insured's and DOFF's motion to strike motion plaintiffs' motion to dismiss insured's and DOFF's appeals from denial of joint anti-SLAPP motion regarding plaintiffs' complaint.	0.30 170.00/hr	51.00
1/29/2012	- JC	Begin review and evaluation of lengthy declaration of P. Berg with exhibits regarding Appellees' motion to strike opening brief and excerpts of record of insured, O. Taitz, in insured's appeal from denial of anti-SLAPP motion to strike appellees'/plaintiffs' complaint in District Court.	0.40 170.00/hr	68.00
	- JC	Begin review and evaluation of declaration of L. Ostella regarding Appellees' motion to strike opening brief and excerpts of record of insured, O. Taitz, in insured's appeal from denial of anti-SLAPP motion to strike appellees'/plaintiffs' complaint in District Court.	0.30 170.00/hr	51.00
1/30/2012	- JC	Begin review and evaluation of appellees' opposition Memorandum of Points and Authorities to insured, O. Taitz's motion to strike appellees' motion to dismiss insured's appeal from denial of anti-SLAPP motion to strike appellees'/plaintiffs' complaint in District Court.	0.50 170.00/hr	85.00
	- JC	Begin review and evaluation of lengthy declaration of L. Liberi regarding Appellees' motion to strike opening brief and excerpts of record of insured, O. Taitz, in insured's appeal from denial of anti-SLAPP motion to strike appellees'/plaintiffs' complaint in District Court.	0.40 170.00/hr	68.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/31/2012	- JC	Begin review and evaluation of appellees' lengthy reply Memorandum of Points and Authorities regarding their motion to strike opening brief and excerpts of record of insured, O. Taitz, in insured's appeal from denial of anti-SLAPP motion to strike appellees'/plaintiffs' complaint in District Court.	0.70 170.00/hr	119.00
	- MLC	Correspondence to and from 9th Circuit appellate court clerk regarding status of Philip Berg's standing in the 9th Circuit.	0.10 95.00/hr	9.50
2/1/2012	- JC	Begin review and analysis of lengthy opposition brief by insured, O. Taitz (as counsel for defendant, Defend Our Freedoms Foundation), to motion by plaintiffs for attorney fees, in appeals by insured and Defend Our Freedoms, toward preparation of coordinated oppositions by insured and Defend Our Freedoms to plaintiffs' motions to dismiss related appeals.	0.50 170.00/hr	85.00
	- JC	Continue review and analysis of initial disclosures by defendant, Intelius Corporation, under FRCP 26 as to witnesses and documents.	0.40 170.00/hr	68.00
	- MLC	Begin drafting Evidentiary Objections to the Declarations of Philip Berg, Lisa Liberi, and Lisa Ostella in Reply to their Opposition to Taitz's Motion to Strike their Motion to Dismiss Opening Brief, pursuant to carrier authority from Laurie Johnson.	1.90 95.00/hr	180.50
	- JC	Begin drafting of insured, O. Taitz's reply Memorandum of Points and Authorities of appellees' opposition Memorandum of Points and Authorities to insured, O. Taitz's motion to strike appellees' motion to dismiss insured's appeal from denial of anti-SLAPP motion to strike appellees'/plaintiffs' complaint in District Court, pursuant to carrier authority from Laurie Johnson.	1.40 170.00/hr	238.00
	- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of reply Memorandum of Points and Authorities of appellees' opposition Memorandum of Points and Authorities to insured, O. Taitz's motion to strike appellees' motion to dismiss insured's appeal from denial of anti-SLAPP motion to strike appellees'/plaintiffs' complaint in District Court.	0.30 170.00/hr	51.00
	- JC	Begin review and analysis of lengthy declaration of Plaintiff, L. Liberi in appeal by defendant, Defend Our Freedoms Inc. (represented by insured, O. Taitz), in opposition to DOFF's motion to strike plaintiffs' application to dismiss appeal and for attorney fees, and toward preparation of coordinated reply Memoranda of Points and Authorities in joint appeal by insured and DOFF.	0.60 170.00/hr	102.00
	- JC	Begin review and analysis of lengthy declaration of Plaintiff, P. Berg, in appeal by defendant, Defend Our Freedoms Inc. (represented by insured, O. Taitz), in opposition to DOFF's motion to strike plaintiffs' application to dismiss appeal and for attorney fees, and toward preparation of coordinated reply	0.60 170.00/hr	102.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
	Memoranda of Points and Authorities in joint appeal by insured and DOFF.		
2/1/2012 - JC	Begin review and analysis of lengthy opposition brief by insured, O. Taitz (as counsel for defendant, Defend Our Freedoms Foundation), to motion by plaintiffs to dismiss appeal by Defend Our Freedoms, in appeals by insured and Defend Our Freedoms, toward preparation of coordinated oppositions by insured and Defend Our Freedoms to plaintiffs' motions to dismiss related appeals.	0.60 170.00/hr	102.00
2/2/2012 - JC	Begin review and analysis of declaration of Plaintiff, L. Ostella, in appeal by defendant, Defend Our Freedoms Inc. (represented by insured, O. Taitz), in opposition to DOFF's motion to strike plaintiffs' application to dismiss appeal and for attorney fees, and toward preparation of coordinated reply Memoranda of Points and Authorities in joint appeal by insured and DOFF.	0.40 170.00/hr	68.00
- JC	Continue drafting of insured, O. Taitz's lengthy Memorandum of Evidentiary Objections to declaration of appellee, L. Liberi, submitted with appellees' opposition to insured's motion to strike appellees' motion to dismiss insured's appeal from denial of anti-SLAPP motion to strike appellees'/plaintiffs' complaint in District Court, pursuant to carrier authority from Laurie Johnson.	0.60 170.00/hr	102.00
- JC	Continue drafting of insured, O. Taitz's lengthy Memorandum of Evidentiary Objections to declaration of appellee, P. Berg, submitted with appellees' opposition to insured's motion to strike appellees' motion to dismiss insured's appeal from denial of anti-SLAPP motion to strike appellees'/plaintiffs' complaint in District Court, pursuant to carrier authority from Laurie Johnson.	0.50 170.00/hr	85.00
- JC	Continue review and analysis of lengthy opposition brief by insured, O. Taitz (as counsel for defendant, Defend Our Freedoms Foundation), to motion by plaintiffs to dismiss appeal by Defend Our Freedoms, in appeals by insured and Defend Our Freedoms, toward preparation of coordinated oppositions by insured and Defend Our Freedoms to plaintiffs' motions to dismiss related appeals.	0.70 170.00/hr	119.00
- JC	Continue drafting of insured, O. Taitz's lengthy Memorandum of Evidentiary Objections to declaration of appellee, L. Liberi, submitted with appellees' opposition to insured's motion to strike appellees' motion to dismiss insured's appeal from denial of anti-SLAPP motion to strike appellees'/plaintiffs' complaint in District Court, pursuant to carrier authority from Laurie Johnson.	0.60 170.00/hr	102.00
- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of lengthy Memorandum of Evidentiary Objections to appellees' three declarations in opposition to insured's motion to strike appellees' motion to dismiss insured's appeal from denial	0.30 170.00/hr	51.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
	of anti-SLAPP motion to strike appellees'/plaintiffs' complaint in District Court.		
2/2/2012 - JC	Continue drafting of insured, O. Taitz's Memorandum of Evidentiary Objections to declaration of appellee, L. Ostella, submitted with appellees' opposition to insured's motion to strike appellees' motion to dismiss insured's appeal from denial of anti-SLAPP motion to strike appellees'/plaintiffs' complaint in District Court, pursuant to carrier authority from Laurie Johnson.	0.30 170.00/hr	51.00
- JC	Continue review and analysis of lengthy opposition brief by insured, O. Taitz (as counsel for defendant, Defend Our Freedoms Foundation), to motion by plaintiffs for attorney fees, in appeals by insured and Defend Our Freedoms, toward preparation of coordinated oppositions by insured and Defend Our Freedoms to plaintiffs' appellate court motions.	0.50 170.00/hr	85.00
- JC	Continue review and analysis of lengthy Memorandum of Points and Authorities by plaintiffs in appeal by defendant, Defend Our Freedoms Inc. (represented by insured, O. Taitz), to DOFF's motion to strike plaintiffs' application to dismiss appeal and for attorney fees, and toward preparation of coordinated reply Memoranda of Points and Authorities in joint appeal by insured and DOFF.	0.60 170.00/hr	102.00
- JC	Begin review and analysis of lengthy Memorandum of Points and Authorities by plaintiffs in appeal by defendant, Defend Our Freedoms Inc. (represented by insured, O. Taitz), to DOFF's motion to strike plaintiffs' application to dismiss appeal and for attorney fees, and toward preparation of coordinated reply Memoranda of Points and Authorities in joint appeal by insured and DOFF.	1.40 170.00/hr	238.00
- JC	Begin drafting of insured, O. Taitz's lengthy Memorandum of Evidentiary Objections to declaration of appellee, P. Berg, submitted with appellees' opposition to insured's motion to strike appellees' motion to dismiss insured's appeal from denial of anti-SLAPP motion to strike appellees'/plaintiffs' complaint in District Court, pursuant to carrier authority from Laurie Johnson.	0.60 170.00/hr	102.00
-	[REDACTED]		
2/3/2012 - JC	Finalize drafting of insured, O. Taitz's lengthy Memorandum of Evidentiary Objections to declaration of appellee, P. Berg, submitted with appellees' opposition to insured's motion to strike appellees' motion to dismiss insured's appeal from denial of anti-SLAPP motion to strike appellees'/plaintiffs' complaint in District Court, pursuant to carrier authority from Laurie Johnson.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/3/2012 -	JC	Finalize drafting of insured, O. Taitz's lengthy Memorandum of Evidentiary Objections to declaration of appellee, L. Liberi, submitted with appellees' opposition to insured's motion to strike appellees' motion to dismiss insured's appeal from denial of anti-SLAPP motion to strike appellees'/plaintiffs' complaint in District Court, pursuant to carrier authority from Laurie Johnson.	0.20 170.00/hr	34.00
-	JC	Continue drafting of insured, O. Taitz's lengthy Memorandum of Evidentiary Objections to declaration of appellee, L. Ostella, submitted with appellees' opposition to insured's motion to strike appellees' motion to dismiss insured's appeal from denial of anti-SLAPP motion to strike appellees'/plaintiffs' complaint in District Court, pursuant to carrier authority from Laurie Johnson.	0.30 170.00/hr	51.00
-	JC	Multiple correspondence with insured, O. Taitz (as counsel for defendant and appellant, Defend Our Freedoms Foundation), regarding preparation of coordinated Memorandum of Points and Authorities, consistent with insured's memorandum, to appellees' opposition to insured's and DOFF's motions to strike appellees' motions to dismiss insured's and DOFF's appeal from denial of anti-SLAPP motion to strike appellees'/plaintiffs' complaint in District Court.	0.30 170.00/hr	51.00
-	MLC	Review and revise Reply by Orly Taitz to Appellees' Opposition to Appellant's Motion to Strike Appellees' Unsigned Motion to Strike Appellant's Opening Brief and Request for Judicial Notice, and to Dismiss Appeal, pursuant to carrier authority from Laurie Johnson.	0.20 95.00/hr	19.00
-	MLC	Review and revise Memorandum of Evidentiary Objections by Orly Taitz to Appellees' Declarations Submitted with their Opposition to Motion to Strike Appellees' Unsigned Motion to Strike Opening Brief and Request for Judicial Notice and to Dismiss Appeal, pursuant to carrier authority from Laurie Johnson.	0.40 95.00/hr	38.00
2/4/2012 -	JC	Finalize review and analysis of lengthy Memorandum of Points and Authorities by plaintiffs in appeal by defendant, Defend Our Freedoms Inc. (represented by insured, O. Taitz), to DOFF's motion to strike plaintiffs' application to dismiss appeal and for attorney fees, and toward preparation of coordinated reply Memoranda of Points and Authorities in joint appeal by insured and DOFF.	0.30 170.00/hr	51.00
2/8/2012 -	[REDACTED]			
	[REDACTED]			
	[REDACTED]			
	[REDACTED]			
	[REDACTED]			

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/8/2012	-	[REDACTED]		
		[REDACTED]		
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		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
2/9/2012	- KS	Conference regarding strategy and meeting with client.	0.40 170.00/hr	68.00
	- KS	Preparation of update to carrier.	0.20 170.00/hr	34.00
	- JC	Begin review and analysis of order of court of appeals in appeals by insured, O. Taitz, and Defend Our Freedoms Foundations (represented by insured), on motions by plaintiffs to dismiss appeals and strike opening briefs and for sanctions, and consolidating both appeals and setting coordinated briefing schedule.	0.50 170.00/hr	85.00
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
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		[REDACTED]		
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	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		

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		<u>Hrs/Rate</u>	<u>Amount</u>
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
2/10/2012 -	[REDACTED]		
	[REDACTED]		
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	[REDACTED]		
-	MLC Review and revise Amended Request for Judicial Notice by Orly Taitz, and Declaration of Kim Schumann in Support of Amended Request.	0.30 95.00/hr	28.50
-	KS Conference regarding future handling.	0.40 170.00/hr	68.00
2/11/2012 -	JC Begin review and analysis of request for judicial notice by defendant, Intelius Corporation, plus 14 pages of exhibits, supporting its motion for summary judgment on plaintiffs' first amended complaint.	0.50 170.00/hr	85.00
2/13/2012 -	JC Begin review and analysis of 25 page Memorandum of Points and Authorities supporting motion for summary judgment by defendant, Intelius Corporation, on plaintiffs' first amended complaint.	1.10 170.00/hr	187.00
-	JC Begin review of numerous pleadings regarding appeal to Third Circuit Court of Appeals by insured, O. Taitz, regarding evaluation of plaintiffs' argument based on appeal and related stay as alleged support for plaintiffs' FRCP Rule 60 motion for relief from judgment as to insured, Y. Taitz, and Daylight Chemical Systems (owned by insured).	0.50 170.00/hr	85.00
-	JC Review application of Reed Elsevier defendants for admission of B. Miller as associated counsel.	0.30 170.00/hr	51.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
2/13/2012 -	[REDACTED]		
	[REDACTED]		
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	[REDACTED]		
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2/14/2012 - JC	Continue review and analysis of case documents regarding appeal by insured, O. Taitz, to Third Circuit Court of Appeals, cited by plaintiffs in support of proposed FRCP Rule 60 motion for relief from judgment as to insured, Y. Taitz and defendant, Daylight Chemical Systems (owned by Y. Taitz), toward drafting of response by Y. Taitz to plaintiffs' meet and confer correspondence regarding proposed motion.	0.60 170.00/hr	102.00
- JC	Begin drafting of response by insured, Y. Taitz, to plaintiffs' lengthy meet and confer correspondence regarding their proposed FRCP Rule 60 motion for relief from judgment as to insured, Y. Taitz and defendant, Daylight Chemical Systems (owned by Y. Taitz).	0.50 170.00/hr	85.00
-	[REDACTED]		
	[REDACTED]		
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	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
- JC	Begin review and analysis of 32 page separate statement supporting motion for summary judgment by defendant, Intelius Corporation, on plaintiffs' first amended complaint.	0.70 170.00/hr	119.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/14/2012	- KS	Conference regarding response to opposing counsel's meet & confer.	0.40 170.00/hr	68.00
	- JC	Continue review and analysis of request for judicial notice by defendant, Intelius Corporation, plus 14 pages of exhibits, supporting its motion for summary judgment on plaintiffs' first amended complaint.	0.60 170.00/hr	102.00
2/15/2012	- JC	Multiple correspondence with insured, O. Taitz (also counsel for various defendants), regarding status of State Bar disciplinary proceeding against plaintiffs' counsel, P. Berg, toward development of potential motion in case to disqualify P. Berg.	0.30 170.00/hr	51.00
	- JC	Continue review and analysis of 25 page Memorandum of Points and Authorities supporting motion for summary judgment by defendant, Intelius Corporation, on plaintiffs' first amended complaint.	0.50 170.00/hr	85.00
	- JC	Begin drafting of evaluation for carrier regarding status of appeals by insured, O. Taitz, and Defend Our Freedoms Foundations, Inc. (represented by insured), including as to Plaintiffs' motions to strike opening briefs and record in appeals, and insured's and DOFF's counter-motions, and consolidation of appeals and briefing schedule.	0.40 170.00/hr	68.00
	-	[REDACTED]		
	- JC	Continue review and analysis of 32 page separate statement supporting motion for summary judgment by defendant, Intelius Corporation, on plaintiffs' first amended complaint.	0.60 170.00/hr	102.00
	- JC	Continue review and analysis of 9 page declaration of defendant, R. Thunen, with 32 pages of exhibits, supporting motion for summary judgment by defendant, Intelius Corporation, on plaintiffs' first amended complaint, and addressing alleged illegal obtaining of plaintiffs' private information by insured, O. Taitz.	0.50 170.00/hr	85.00
	- JC	Begin review and analysis of declaration of defendant, N. Sankey, supporting motion for summary judgment by defendant, Intelius Corporation, on plaintiffs' first amended complaint, and addressing alleged illegal obtaining of plaintiffs' private information by insured, O. Taitz.	0.40 170.00/hr	68.00
	- JC	Begin drafting of evaluation of legal issues and status for carrier regarding State Bar disciplinary proceeding against plaintiffs' counsel P. Berg, and potential effect on prosecution of plaintiffs' lawsuit against insureds, O. and Y. Taitz.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/17/2012	- JC	Continue review and analysis of 25 page Memorandum of Points and Authorities supporting motion for summary judgment by defendant, Intelius Corporation, on plaintiffs' first amended complaint.	0.80 170.00/hr	136.00
	- KS	Finalize detailed update to carrier regarding appeals.	0.50 170.00/hr	85.00
2/20/2012	- JC	Continue review and analysis of 32 page separate statement supporting motion for summary judgment by defendant, Intelius Corporation, on plaintiffs' first amended complaint.	0.70 170.00/hr	119.00
	- JC	Continue review and analysis of 9 page declaration of defendant, R. Thunen, with 32 pages of exhibits, supporting motion for summary judgment by defendant, Intelius Corporation, on plaintiffs' first amended complaint, and addressing alleged illegal obtaining of plaintiffs' private information by insured, O. Taitz.	0.50 170.00/hr	85.00
	- JC	Begin review and analysis of declaration of defendant, T. Sankey, supporting motion for summary judgment by defendant, Intelius Corporation, on plaintiffs' first amended complaint, and addressing alleged illegal obtaining of plaintiffs' private information by insured, O. Taitz.	0.40 170.00/hr	68.00
	- JC	Begin review and analysis of plaintiffs' 68 page separate statement of disputed material facts in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured, O. Taitz's illegal obtaining of plaintiffs' private information from Intelius.	0.60 170.00/hr	102.00
2/21/2012	- JC	Finalize review and analysis of 25 page Memorandum of Points and Authorities supporting motion for summary judgment by defendant, Intelius Corporation, on plaintiffs' first amended complaint.	0.60 170.00/hr	102.00
	- JC	Begin review and analysis of 13 page declaration of plaintiff, L. Ostella plus 70 pages of exhibits, in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured's illegal obtaining of plaintiffs' private information from Intelius.	0.60 170.00/hr	102.00
	- JC	Begin review and analysis of plaintiffs' evidentiary objections to declaration of insured, O. Taitz, in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured's illegal obtaining of plaintiffs' private information from Intelius.	0.30 170.00/hr	51.00
	- JC	Begin review and analysis of 7 page declaration of plaintiff, P. Berg, in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured's illegal obtaining of plaintiffs' private information from Intelius.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/21/2012	- JC	Begin review and analysis of 22 page declaration of plaintiff, L. Liberi, plus 60 pages of exhibits, in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured's illegal obtaining of plaintiffs' private information from Intelius.	0.50 170.00/hr	85.00
	- JC	Begin review and analysis of 15 page declaration of K. Strebel plus 55 pages of exhibits, in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured, O. Taitz's illegal obtaining of plaintiffs' private information from Intelius.	0.50 170.00/hr	85.00
	- KS	Conference regarding opposing counsel's multiple new filings.	0.40 170.00/hr	68.00
	- JC	Begin review and analysis of plaintiffs' 25 page Memorandum of Points and Authorities in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured, O. Taitz's illegal obtaining of plaintiffs' private information from Intelius.	0.60 170.00/hr	102.00
2/22/2012	- JC	Continue review and analysis of plaintiffs' 68 page separate statement of disputed material facts in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured, O. Taitz's illegal obtaining of plaintiffs' private information from Intelius.	0.60 170.00/hr	102.00
	- JC	Finalize review and analysis of 32 page separate statement supporting motion for summary judgment by defendant, Intelius Corporation, on plaintiffs' first amended complaint.	0.50 170.00/hr	85.00
	- JC	Continue review and analysis of plaintiffs' 25 page Memorandum of Points and Authorities in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured, O. Taitz's illegal obtaining of plaintiffs' private information from Intelius.	0.50 170.00/hr	85.00
	- JC	Continue review and analysis of 13 page declaration of plaintiff, L. Ostella plus 70 pages of exhibits, in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured's illegal obtaining of plaintiffs' private information from Intelius.	0.60 170.00/hr	102.00
	- JC	Continue review and analysis of 22 page declaration of plaintiff, L. Liberi, plus 60 pages of exhibits, in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured's illegal obtaining of plaintiffs' private information from Intelius.	0.40 170.00/hr	68.00
	- JC	Begin review and analysis of opposing counsel's lengthy 2/22/12 reply correspondence regarding plaintiffs' proposed FRCP Rule 60 motion for relief from judgment.	0.40 170.00/hr	68.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
2/22/2012 -	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
2/23/2012 - JC	Continue review and analysis of plaintiffs' 68 page separate statement of disputed material facts in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured, O. Taitz's illegal obtaining of plaintiffs' private information from Intelius.	0.50 170.00/hr	85.00
- JC	Begin review and analysis of reply Memorandum of Points and Authorities of defendant, Intelius Inc., regarding its motion for summary judgment on first amended complaint.	0.50 170.00/hr	85.00
- JC	Continue review and analysis of opposing counsel's lengthy 2/22/12 reply correspondence regarding plaintiffs' proposed FRCP Rule 60 motion for relief from judgment, including review and analysis of portions of voluminous court docket relied upon by plaintiffs for argument regarding previous stay of case regarding appeal to Third Circuit Court of Appeals.	0.70 170.00/hr	119.00
-	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
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	[REDACTED]		
- JC	Continue review and analysis of plaintiffs' evidentiary objections to declaration of insured, O. Taitz, in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured's illegal obtaining of plaintiffs' private information from Intelius.	0.30 170.00/hr	51.00
- JC	Continue review and analysis of plaintiffs' 25 page Memorandum of Points and Authorities in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured, O. Taitz's illegal obtaining of plaintiffs' private information from Intelius.	0.70 170.00/hr	119.00
- JC	Continue review and analysis of 7 page declaration of plaintiff, P. Berg, in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of	0.30 170.00/hr	51.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	insured's illegal obtaining of plaintiffs' private information from Intelius.		
2/23/2012 - JC	Continue review and analysis of 15 page declaration of K. Strebel plus 55 pages of exhibits, in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured, O. Taitz's illegal obtaining of plaintiffs' private information from Intelius.	0.40 170.00/hr	68.00
2/24/2012 - JC	Continue review and analysis of 15 page declaration of K. Strebel plus 55 pages of exhibits, in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured, O. Taitz's illegal obtaining of plaintiffs' private information from Intelius.	0.50 170.00/hr	85.00
- JC	Continue review and analysis of 13 page declaration of plaintiff, L. Ostella plus 70 pages of exhibits, in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured's illegal obtaining of plaintiffs' private information from Intelius.	0.60 170.00/hr	102.00
- JC	Finalize review and analysis of 9 page declaration of defendant, R. Thunen, with 32 pages of exhibits, supporting motion for summary judgment by defendant, Intelius Corporation, on plaintiffs' first amended complaint, and addressing alleged illegal obtaining of plaintiffs' private information by insured, O. Taitz.	0.40 170.00/hr	68.00
- JC	Continue review and analysis of 22 page declaration of plaintiff, L. Liberi, plus 60 pages of exhibits, in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured's illegal obtaining of plaintiffs' private information from Intelius.	0.60 170.00/hr	102.00
- KS	Conference regarding opposing counsel's proposal for new law and motion.	0.20 170.00/hr	34.00
2/25/2012 - JC	Finalize review and analysis of 7 page declaration of plaintiff, P. Berg, in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured's illegal obtaining of plaintiffs' private information from Intelius.	0.30 170.00/hr	51.00
2/26/2012 -	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
2/27/2012 - JC	Finalize review and analysis of 22 page declaration of plaintiff, L. Liberi, plus 60 pages of exhibits, in opposition to motion for summary judgment of defendant, Intelius Corporation, including	0.50 170.00/hr	85.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	regarding allegations of insured's illegal obtaining of plaintiffs' private information from Intelius.		
2/27/2012 - JC	Finalize review and analysis of plaintiffs' 25 page Memorandum of Points and Authorities in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured, O. Taitz's illegal obtaining of plaintiffs' private information from Intelius.	0.50 170.00/hr	85.00
- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of coordinated reply brief on appeal in appeal by insured and defendant, Defend Our Freedoms Foundation (represented by insured).	0.30 170.00/hr	51.00
- JC	Finalize review and analysis of 15 page declaration of K. Strebel plus 55 pages of exhibits, in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured, O. Taitz's illegal obtaining of plaintiffs' private information from Intelius.	0.40 170.00/hr	68.00
- JC	Begin review and analysis of 110 page response to plaintiffs' separate statement regarding motion for summary judgment by defendant, Intelius Corporation, including regarding insured, O. Taitz's alleged illegal use of Intelius products regarding plaintiffs.	0.70 170.00/hr	119.00
- JC	Finalize review and analysis of plaintiffs' 68 page separate statement of disputed material facts in opposition to motion for summary judgment of defendant, Intelius Corporation, including regarding allegations of insured, O. Taitz's illegal obtaining of plaintiffs' private information from Intelius.	0.50 170.00/hr	85.00
- JC	Continue review and analysis of reply Memorandum of Points and Authorities of defendant, Intelius Inc., regarding its motion for summary judgment on first amended complaint.	0.40 170.00/hr	68.00
-	[REDACTED]		
-	[REDACTED]		
-	[REDACTED]		
-	[REDACTED]		
-	[REDACTED]		
- JC	Begin review and analysis of 103 page memorandum of evidentiary objections by defendant, Intelius Corporation, to plaintiffs' voluminous evidence, regarding Intelius's motion for summary judgment on complaint, including regarding allegations of insured, O. Taitz's illegal obtaining of plaintiffs' private information from Intelius.	1.10 170.00/hr	187.00
-	[REDACTED]		
-	[REDACTED]		
-	[REDACTED]		

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			<u>Hrs/Rate</u>	<u>Amount</u>
		[REDACTED]		
		[REDACTED]		
2/27/2012 - JC	Review opposing counsel's 2/27/12 correspondence to court, and related notice to all counsel, regarding plaintiffs' request for leave to file motion for summary judgment vs. Sankey defendants.		0.40 170.00/hr	68.00
-	[REDACTED]	[REDACTED]		
	[REDACTED]	[REDACTED]		
	[REDACTED]	[REDACTED]		
- JC	Begin review and analysis of 27 page reply Memorandum of Points and Authorities of defendant, Intelius Corporation, to plaintiffs' opposition to Intelius's motion for summary judgment, including regarding insured, O. Taitz's alleged illegal use of Intelius products regarding plaintiffs.		0.60 170.00/hr	102.00
2/28/2012 - JC	Continue review and analysis of 27 page reply Memorandum of Points and Authorities of defendant, Intelius Corporation, to plaintiffs' opposition to Intelius's motion for summary judgment, including regarding insured, O. Taitz's alleged illegal use of Intelius products regarding plaintiffs.		1.10 170.00/hr	187.00
- JC	Review plaintiffs' counsel's 2/27/12 request to court, and related correspondence to court and all counsel, for leave to file sur-reply Memorandum of Points and Authorities regarding motion for summary judgment of Reed and Intelius defendants.		0.40 170.00/hr	68.00
- JC	Continue review and analysis of 110 page response to plaintiffs' separate statement regarding motion for summary judgment by defendant, Intelius Corporation, including regarding insured, O. Taitz's alleged illegal use of Intelius products regarding plaintiffs.		1.20 170.00/hr	204.00
- JC	Continue review and analysis of 103 page memorandum of evidentiary objections by defendant, Intelius Corporation, to plaintiffs' voluminous evidence, regarding Intelius's motion for summary judgment on complaint, including regarding allegations of insured, O. Taitz's illegal obtaining of plaintiffs' private information from Intelius.		0.80 170.00/hr	136.00
- JC	Begin review and analysis of 10 page opposition Memorandum of Points and Authorities and evidentiary objections by defendant, Intelius Corporation, to plaintiffs' request for judicial notice in opposition to Intelius motion for summary judgment on first amended complaint.		0.70 170.00/hr	119.00
- JC	Finalize review and analysis of 13 page declaration of plaintiff, L. Ostella plus 70 pages of exhibits, in opposition to motion for summary judgment of defendant, Intelius Corporation, including		0.40 170.00/hr	68.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
		regarding allegations of insured's illegal obtaining of plaintiffs' private information from Intelius.		
2/28/2012	- JC	Begin review and analysis of 18 page response Memorandum of Points and Authorities by defendant, Intelius Corporation, regarding plaintiffs' evidentiary objections to declaration of insured, O. Taitz, supporting Intelius's motion for summary judgment on first amended complaint.	1.20 170.00/hr	204.00
2/29/2012	- JC	Finalize review and analysis of 103 page memorandum of evidentiary objections by defendant, Intelius Corporation, to plaintiffs' voluminous evidence, regarding Intelius's motion for summary judgment on complaint, including regarding allegations of insured, O. Taitz's illegal obtaining of plaintiffs' private information from Intelius.	0.60 170.00/hr	102.00
	- JC	Finalize review and analysis of 27 page reply Memorandum of Points and Authorities of defendant, Intelius Corporation, to plaintiffs' opposition to Intelius's motion for summary judgment, including regarding insured, O. Taitz's alleged illegal use of Intelius products regarding plaintiffs.	0.70 170.00/hr	119.00
	- JC	Begin review and analysis of declaration of R. Thunen of defendant, Intelius Corporation, regarding Intelius' reply to plaintiffs' opposition to Intelius motion for summary judgment on first amended complaint.	0.40 170.00/hr	68.00
	- JC	Finalize review and analysis of 110 page response to plaintiffs' separate statement regarding motion for summary judgment by defendant, Intelius Corporation, including regarding insured, O. Taitz's alleged illegal use of Intelius products regarding plaintiffs.	0.70 170.00/hr	119.00
3/1/2012	- JC	Begin review and analysis of defendant, Intelius Corporation's lengthy (28 page) responses to Special Interrogatories (set one) by plaintiffs.	0.60 170.00/hr	102.00
	- JC	Begin review and analysis of 11 page FRCP Rule 26 initial disclosures by Sankey defendants.	0.40 170.00/hr	68.00
	- JC	Correspondence with opposing counsel regarding plaintiffs' application to continue dates for filing of respondents' and appellants' briefs in appeal.	0.20 170.00/hr	34.00
	- JC	Begin review and analysis of plaintiffs' 117 page initial request for judicial notice supporting opposition to motion for summary judgment of defendant, Intelius Corporation.	0.60 170.00/hr	102.00
	- JC	Begin review and analysis of Special Interrogatories, set one, by defendant, T. Sankey, to plaintiff, P. Berg.	0.20 170.00/hr	34.00
	- KS	Finalize update to carrier.	0.20 170.00/hr	34.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/1/2012	- JC	Begin review and analysis of defendant, Intelius Corporation's 29 page reply Memorandum of Points and Authorities regarding its motion for summary judgment on first amended complaint.	0.50 170.00/hr	85.00
	- JC	Begin review and analysis of defendant, Intelius Corporation's lengthy (20 page) responses to Request for Production of Documents (set one) by plaintiffs.	0.50 170.00/hr	85.00
3/2/2012	- JC	Begin review and analysis of defendant, Intelius Corporation's responses to Request for Admissions (set one) by plaintiffs.	0.40 170.00/hr	68.00
	- JC	Begin review and analysis of Request for Admissions, set one, by defendant, T. Sankey, to plaintiff, L. Liberi.	0.40 170.00/hr	68.00
	- JC	Correspondence with insured, O. Taitz (as counsel for appellant, Defend Our Freedoms Foundation), regarding plaintiffs' application to continue dates for filing of respondents' and appellants' briefs in appeal.	0.20 170.00/hr	34.00
	- JC	Correspondence with opposing counsel regarding response of insured, O. Taitz, and Defend Our Freedoms Foundations (represented by insured) to plaintiffs' application to continue dates for filing of respondents' and appellants' briefs in appeal.	0.20 170.00/hr	34.00
	- JC	Continue review and analysis of plaintiffs' 117 page initial request for judicial notice supporting opposition to motion for summary judgment of defendant, Intelius Corporation.	0.50 170.00/hr	85.00
	- JC	Begin review and analysis of Request for Production of Documents, set one, by defendant, T. Sankey, to plaintiff, P. Berg.	0.30 170.00/hr	51.00
	- JC	Continue review and analysis of defendant, Intelius Corporation's lengthy (20 page) responses to Request for Production of Documents (set one) by plaintiffs.	0.60 170.00/hr	102.00
3/3/2012	- JC	Continue review and analysis of defendant, Intelius Corporation's 29 page reply Memorandum of Points and Authorities regarding its motion for summary judgment on first amended complaint.	1.10 170.00/hr	187.00
	- JC	Continue review and analysis of defendant, Intelius Corporation's lengthy (28 page) responses to Special Interrogatories (set one) by plaintiffs.	0.70 170.00/hr	119.00
	- JC	Continue review and analysis of Special Interrogatories, set one, by defendant, T. Sankey, to plaintiff, P. Berg.	0.20 170.00/hr	34.00
	- JC	Begin review and analysis of Special Interrogatories, set one, by defendant, T. Sankey, to plaintiff, L. Ostella.	0.20 170.00/hr	34.00
	- JC	Continue review and analysis of 11 page FRCP Rule 26 initial disclosures by Sankey defendants.	0.40 170.00/hr	68.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/4/2012	- JC	Continue review and analysis of plaintiffs' 117 page initial request for judicial notice supporting opposition to motion for summary judgment of defendant, Intelius Corporation.	0.50 170.00/hr	85.00
3/5/2012	- JC	Finalize review and analysis of defendant, Intelius Corporation's lengthy (20 page) responses to Request for Production of Documents (set one) by plaintiffs.	0.50 170.00/hr	85.00
	- JC	Continue review and analysis of defendant, Intelius Corporation's responses to Request for Admissions (set one) by plaintiffs.	0.50 170.00/hr	85.00
	- JC	Continue review and analysis of defendant, Intelius Corporation's 29 page reply Memorandum of Points and Authorities regarding its motion for summary judgment on first amended complaint.	0.50 170.00/hr	85.00
	- JC	Continue review and analysis of Request for Admissions, set one, by defendant, T. Sankey, to plaintiff, L. Liberi.	0.40 170.00/hr	68.00
	- JC	Begin review and analysis of Special Interrogatories, set one, by defendant, T. Sankey, to plaintiff, L. Liberi.	0.20 170.00/hr	34.00
	- JC	Review and analysis of order granting appellees' request for extension to file answering brief and supplemental excerpts of record, and related extension regarding reply of insured, O. Taitz.	0.40 170.00/hr	68.00
	- JC	Begin review of court's 3/5/12 order denying plaintiffs' request for leave to file sur-reply memorandum and evidence regarding motion for summary judgment of defendant, Intelius, Inc.	0.30 170.00/hr	51.00
	- JC	Begin review and analysis of Request for Production of Documents, set one, by defendant, T. Sankey, to plaintiff, L. Ostella.	0.30 170.00/hr	51.00
3/6/2012	- JC	Begin review and analysis of Request for Production of Documents, set one, by defendant, T. Sankey, to plaintiff, L. Liberi.	0.30 170.00/hr	51.00
	- JC	Begin review and analysis of proposed stipulation and confidentiality order regarding discovery.	0.30 170.00/hr	51.00
	- JC	Continue review and analysis of Special Interrogatories, set one, by defendant, T. Sankey, to plaintiff, L. Ostella.	0.20 170.00/hr	34.00
	- JC	Multiple correspondence with all counsel regarding proposed stipulation and confidentiality order regarding discovery.	0.30 170.00/hr	51.00
	- JC	Continue review and analysis of Special Interrogatories, set one, by defendant, T. Sankey, to plaintiff, L. Ostella.	0.20 170.00/hr	34.00
	- JC	Finalize review and analysis of plaintiffs' 117 page initial request for judicial notice supporting opposition to motion for summary judgment of defendant, Intelius Corporation.	0.40 170.00/hr	68.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/6/2012 -	JC	Begin review and analysis of plaintiffs' 38 page supplemental request for judicial notice supporting opposition to motion for summary judgment of defendant, Intelius Corporation.	0.50 170.00/hr	85.00
3/7/2012 -	JC	Finalize review and analysis of defendant, Intelius Corporation's 29 page reply Memorandum of Points and Authorities regarding its motion for summary judgment on first amended complaint.	0.30 170.00/hr	51.00
-	JC	Review and analysis of court's 3/6/12 notice of ruling, and related 3/5/12 order, granting plaintiffs' request to file motion for summary judgment vs. Sankey defendants.	0.30 170.00/hr	51.00
-	JC	Review and analysis of Reed defendants' 3/6/12 electronic request to court, and 3/6/12 letter to court, requesting leave to file motion for summary judgment vs. plaintiffs.	0.30 170.00/hr	51.00
-	JC	Begin review and analysis of plaintiff, P. Berg's 5 page declaration supporting plaintiffs' request for judicial notice in opposition to motion for summary judgment of defendant, Intelius Corporation.	0.40 170.00/hr	68.00
-	JC	Finalize review and analysis of defendant, Intelius Corporation's lengthy (28 page) responses to Special Interrogatories (set one) by plaintiffs.	0.40 170.00/hr	68.00
-	KS	Conference regarding future handling and regarding protective order for insured.	0.30 170.00/hr	51.00
-	JC	Continue review and analysis of plaintiffs' 38 page supplemental request for judicial notice supporting opposition to motion for summary judgment of defendant, Intelius Corporation.	0.70 170.00/hr	119.00
3/8/2012 -	JC	Finalize review and analysis of plaintiffs' 38 page supplemental request for judicial notice supporting opposition to motion for summary judgment of defendant, Intelius Corporation.	0.40 170.00/hr	68.00
-	JC	Finalize review and analysis of Request for Admissions, set one, by defendant, T. Sankey, to plaintiff, L. Liberi.	0.20 170.00/hr	34.00
3/9/2012 -	JC	Continue review and analysis of 16 page proposed stipulated confidentiality agreement, and proposed order, submitted by defendants, Reed Elsevier Inc. and LexisNexis Risk Solutions Inc.	0.80 170.00/hr	136.00
-	JC	Finalize review and analysis of defendant, Intelius Corporation's responses to Request for Admissions (set one) by plaintiffs.	0.40 170.00/hr	68.00
-	JC	Begin drafting lengthy update report to carrier regarding status of pleadings, various motions for summary judgment, proposed confidentiality agreement and order, and pending appeal by insured, O. Taitz.	0.80 170.00/hr	136.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
3/10/2012 -	JC	Begin review and analysis of court's 12 page tentative order with findings on motion for summary judgment of defendant, Intelius Inc., including as to insured, O. Taitz's alleged illegal obtaining of plaintiffs' information from Intelius.	0.50 170.00/hr	85.00
3/11/2012 -	JC	Continue review and analysis of court's 12 page tentative order with findings on motion for summary judgment of defendant, Intelius Inc., including as to insured, O. Taitz's alleged illegal obtaining of plaintiffs' information from Intelius.	0.40 170.00/hr	68.00
3/12/2012 -	JC	Attend hearing on motion for summary judgment of defendant, Intelius Corporation, to plaintiffs' first amended complaint.	1.50 170.00/hr	255.00
-	JC	Review notice of bankruptcy case filing, and bankruptcy automatic stay, regarding defendants, N. Sankey and Sankey Investigations.	0.30 170.00/hr	51.00
-	JC	Travel to and from court for hearing on motion for summary judgment of defendant, Intelius Corporation, to plaintiffs' first amended complaint.	1.40 170.00/hr	238.00
3/13/2012 -	JC	Review court's 3/13/12 order granting leave to Sankey defendants to file motion for relief from deemed admitted Request for Admissions from plaintiffs to Sankey defendants.	0.30 170.00/hr	51.00
-	JC	Review court's 3/12/12 order granting request by Reed defendants to file motion for summary judgment on plaintiffs' first amended complaint.	0.30 170.00/hr	51.00
-	JC	Correspondence with several counsel regarding filing of bankruptcy by defendant, N. Sankey, and effect of related bankruptcy stay in case.	0.20 170.00/hr	34.00
3/15/2012 -	JC	Review plaintiffs' electronic request to court, and separate correspondence with exhibits, regarding supplement to plaintiffs' sur-reply Memorandum of Points and Authorities regarding their opposition to motion for summary judgment of defendant, Intelius Corporation.	0.40 170.00/hr	68.00
-	JC	Begin review and analysis of bankruptcy petition and related filings by defendants, N. Sankey and Sankey Investigations, Inc., regarding evaluation of scope of bankruptcy automatic stay in Liberi v. Taitz case.	0.30 170.00/hr	51.00
3/16/2012 -	JC	Correspondence with insured, O. Taitz, regarding proposed stipulated confidentiality agreement and order proposed by defendant, Reed Elsevier, Inc.	0.20 170.00/hr	34.00
-	JC	Continue review and analysis of bankruptcy petition and related filings by defendants, N. Sankey and Sankey Investigations, Inc., regarding evaluation of scope of bankruptcy automatic stay in	0.30 170.00/hr	51.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	Liberi v. Taitz case, and analysis of Sankey Investigations corporate legal standing.		
3/16/2012 - JC	Begin drafting portion of comprehensive update for carrier regarding bankruptcy filing of defendants, N. Sankey and Sankey Investigations, including as to effect of bankruptcy stay in Liberi v. Taitz case.	0.30 170.00/hr	51.00
- JC	Begin drafting portion of comprehensive update for carrier regarding Motion for summary judgment by defendant, Intelius Corporation, on plaintiffs' first amended complaint, including effect on defense of insured, O. Taitz.	0.30 170.00/hr	51.00
- JC	Begin review and analysis of court's final ruling and order granting motion for summary judgment by defendant, Intelius Corporation, on plaintiffs' first amended complaint, and toward evaluation of effect of order and related findings on defense by insured, O. Taitz.	0.40 170.00/hr	68.00
-	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
	[REDACTED]		
3/19/2012 - JC	Begin review and analysis of court of appeals' 3/19/12 order regarding plaintiffs'/appellees' opening brief, in appeal by insured, O. Taitz, and defendant, Defend Our Freedoms Inc. (represented by insured), from denial of anti-SLAPP motion to strike complaint.	0.30 170.00/hr	51.00
- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of reply brief in appeal by insured and defendant, Defend Our Freedoms Foundations (represented by insured).	0.30 170.00/hr	51.00
- JC	Begin review and analysis of plaintiffs'/appellees' 63 page opening brief, toward drafting of reply brief of insured, O. Taitz, in appeal by insured and defendant, Defend Our Freedoms Inc. (represented by insured), from denial of anti-SLAPP motion to strike complaint.	0.40 170.00/hr	68.00
3/20/2012 - JC	Review and analysis of request by insured and appellant, O. Taitz (as counsel for co-appellant, Defend Our Freedoms Foundation), for extension to file consolidated reply brief, order on request, and notice of order prepared by insured, in appeal from denial of insured's and DOFF's anti-SLAPP motion to strike complaint.	0.40 170.00/hr	68.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/20/2012 -	JC	Continue review and analysis of plaintiffs'/appellees' 63 page opening brief, toward drafting of reply brief of insured, O. Taitz, in appeal by insured and defendant, Defend Our Freedoms Inc. (represented by insured), from denial of anti-SLAPP motion to strike complaint.	0.90 170.00/hr	153.00
3/21/2012 -	JC	Begin review and analysis of plaintiffs'/appellees' five volume (over 1400 pages) supplemental excerpts of record, toward drafting of reply brief of insured, O. Taitz, in appeal by insured and defendant, Defend Our Freedoms Inc. (represented by insured), from denial of anti-SLAPP motion to strike complaint.	0.70 170.00/hr	119.00
-	JC	Multiple correspondence with insured, O. Taitz, regarding reporter's transcript of hearing in Pennsylvania State Bar disciplinary matter against P. Berg, plaintiffs' counsel, including regarding potential suspension of plaintiffs' counsel.	0.30 170.00/hr	51.00
3/22/2012 -	JC	Multiple correspondence with insured, O. Taitz, regarding analysis of plaintiffs' Answering Brief in appeal by insured and defendant, Defend Our Freedoms Foundations (represented by insured), from denial of their anti-SLAPP motion to strike complaint.	0.30 170.00/hr	51.00
-	JC	Continue review and analysis of plaintiffs'/appellees' five volume (over 1400 pages) supplemental excerpts of record, toward drafting of reply brief of insured, O. Taitz, in appeal by insured and defendant, Defend Our Freedoms Inc. (represented by insured), from denial of anti-SLAPP motion to strike complaint.	0.70 170.00/hr	119.00
-	JC	Correspondence with counsel for LexisNexis defendants and court, regarding such defendants' motion for summary judgment, and potential continuance of trial.	0.20 170.00/hr	34.00
3/23/2012 -	JC	Correspondence with court clerk regarding compliance by all parties with court's scheduling orders, including as to hearings on various defendants' motions for summary judgment.	0.20 170.00/hr	34.00
-	JC	Review and analysis of defendant, Intelius Corporation's 3/23/12 correspondence to court requesting leave to file FRCP Rule 11 sanctions motion against plaintiffs.	0.30 170.00/hr	51.00
-	JC	Review of plaintiffs'/appellees' notice of filing of supplemental excerpts of record in appeal by insured, O. Taitz, and Defend Our Freedoms Foundations from denial of their joint anti-SLAPP motion to strike complaint.	0.30 170.00/hr	51.00
3/24/2012 -	JC	Begin review and analysis of report by private investigator B. Goldner regarding hearing in Pennsylvania State Bar disciplinary case against Plaintiff, P. Berg (also Plaintiffs' counsel), regarding potential disbarment of opposing counsel and effect on case.	0.50 170.00/hr	85.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/24/2012 -	JC	Multiple correspondence with insured, O. Taitz (also counsel for several defendants), regarding proposed stipulation regarding confidentiality by Reed defendants, and toward preparation of coordinated response regarding proposed stipulation.	0.30 170.00/hr	51.00
3/25/2012 -	JC	Correspondence with insured, O. Taitz, regarding decision of Pennsylvania State Bar in disciplinary proceeding against plaintiff, P. Berg (counsel for all plaintiffs), toward potential motion to disqualify opposing counsel in Liberi v. Taitz case.	0.20 170.00/hr	34.00
3/26/2012 -	JC	Correspondence with insured, O. Taitz (also counsel for several defendants), regarding preparation of coordinated response regarding proposed stipulation regarding confidentiality by Reed defendants.	0.20 170.00/hr	34.00
-	MLC	Lengthy telephone call with 9th circuit court clerk regarding filing a consolidated brief for both DOFF and Orly Taitz.	0.20 95.00/hr	19.00
-	MLC	Telephone call to 9th circuit court clerk to request two-week telephonic extension to file Orly Taitz's Reply Brief.	0.10 95.00/hr	9.50
-	JC	Begin drafting of portion of reply brief of insured, O. Taitz, responding to appellees' arguments regarding jurisdiction of court of appeals in appeal by insured and defendant, Defend Our Freedoms Foundations (represented by insured), from denial of anti-SLAPP motion to strike.	2.10 170.00/hr	357.00
-	JC	Begin review and analysis of numerous cases cited by appellees regarding jurisdiction of court of appeals in appeal by insured and defendant, Defend Our Freedoms Foundations (represented by insured), from denial of anti-SLAPP motion to strike, toward drafting of portion of reply brief of insured responding to appellees' arguments regarding jurisdiction of court of appeals.	1.10 170.00/hr	187.00
-	JC	Begin drafting of portion of reply brief of insured, O. Taitz, responding to appellees' arguments regarding rights to amend complaint and effect on anti-SLAPP motion, in appeal by insured and defendant, Defend Our Freedoms Foundations (represented by insured), from denial of anti-SLAPP motion to strike.	0.90 170.00/hr	153.00
-	MLC	Prepare Notice of fourteen day extension to file Reply Brief on behalf of Orly Taitz.	0.10 95.00/hr	9.50
-	MLC	Telephone call from 9th circuit court clerk regarding our request for 2 week extension to file Reply Brief on behalf of Orly Taitz; clerk thought she had already granted this request.	0.10 95.00/hr	9.50
-	JC	Continue review and analysis of plaintiffs'/appellees' five volume (over 1400 pages) supplemental excerpts of record, toward drafting of reply brief of insured, O. Taitz, in appeal by insured and defendant, Defend Our Freedoms Inc. (represented by insured), from denial of anti-SLAPP motion to strike complaint.	0.60 170.00/hr	102.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/29/2012	- JC	Begin review and analysis of 19 page Memorandum of Points and Authorities, declaration and exhibits supporting ex-parte application of Reed and Lexis defendants to specially set defendants' motion for summary judgment vs. plaintiffs.	0.50 170.00/hr	85.00
	- JC	Review and analysis of court's 3/29/12 order, and notice of filing of order, granting request of defendant, Intelius, to file motion seeking sanctions against plaintiffs.	0.30 170.00/hr	51.00
3/30/2012	- MLC	Review Pennsylvania Disciplinary Board web site to determine outcome of Philip Berg's disciplinary hearing scheduled on 02/10/12. No records found online.	0.20 95.00/hr	19.00
	- JC	Continue review and analysis of numerous case law and statutory authorities cited by plaintiffs/appellees in their Answering Brief, regarding discretion of lower court to deny anti-SLAPP motion to strike of insured, O. Taitz, and Defend Our Freedoms Foundation (represented by insured), toward drafting of insured's counter-arguments in Reply Brief.	0.50 170.00/hr	85.00
	- JC	Begin review and analysis of plaintiffs' 15 page Memorandum of Points and Authorities opposing ex-parte application of Reed and Lexis defendants, to specially set defendants' motion for summary judgment vs. plaintiffs.	0.60 170.00/hr	102.00
	- JC	Begin review and analysis of reply memorandum supporting ex-parte application of Reed and Lexis defendants to specially set defendants' motion for summary judgment vs. plaintiffs.	0.30 170.00/hr	51.00
	- JC	Continue review and analysis of 19 page Memorandum of Points and Authorities, declaration and exhibits supporting ex-parte application of Reed and Lexis defendants to specially set defendants' motion for summary judgment vs. plaintiffs.	0.30 170.00/hr	51.00
3/31/2012	- JC	Continue review and analysis of plaintiffs' 15 page Memorandum of Points and Authorities opposing ex-parte application of Reed and Lexis defendants, to specially set defendants' motion for summary judgment vs. plaintiffs.	0.30 170.00/hr	51.00
4/1/2012	- JC	Begin review and analysis of 9 page declaration of plaintiff, L. Ostella, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.40 170.00/hr	68.00
	- JC	Continue drafting comprehensive update for carrier, including as to pending appeals, related stay, and recent motion activities.	0.50 170.00/hr	85.00
4/2/2012	- JC	Review and analysis of court's 3/30/12 order granting Sankey defendants' request to file motions for stay, including as to plaintiffs' motion for summary judgment vs. Sankey defendants, and regarding stay of discovery involving insured, O. Taitz.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/2/2012	- JC	Begin review and analysis of lengthy (19 pages) declaration of plaintiff, L. Liberi, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.60 170.00/hr	102.00
	- JC	Finalize drafting of comprehensive update for carrier, including as to pending appeals, related stay, and recent motion activities.	0.40 170.00/hr	68.00
	- JC	Begin review and analysis of plaintiffs' 27 page Memorandum of Points and Authorities supporting motion for summary judgment vs. Sankey defendants, including as to alleged liability of insureds, O. and Y. Taitz, for acts of Sankey defendants on conspiracy and vicarious liability bases.	0.50 170.00/hr	85.00
	- JC	Begin review and analysis of 8 page declaration of plaintiff, P. Berg, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.40 170.00/hr	68.00
4/3/2012	- JC	Begin review and analysis of lengthy (99 pages) exhibits to declaration of plaintiff, L. Liberi, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.60 170.00/hr	102.00
	- JC	Begin review and analysis of lengthy (125 pages) exhibits for declaration of plaintiff, L. Ostella, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.50 170.00/hr	85.00
	- KS	Finalize update to carrier.	0.30 170.00/hr	51.00
	- JC	Continue review and analysis of 9 page declaration of plaintiff, L. Ostella, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.60 170.00/hr	102.00
	- JC	Continue review and analysis of plaintiffs'/appellees' five volume (over 1400 pages) supplemental excerpts of record, toward drafting of reply brief of insured, O. Taitz, in appeal by insured and defendant, Defend Our Freedoms Inc. (represented by insured), from denial of anti-SLAPP motion to strike complaint.	0.50 170.00/hr	85.00
	- JC	Continue review and analysis of lengthy (19 pages) declaration of plaintiff, L. Liberi, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.50 170.00/hr	85.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/3/2012	- JC	Review court's 4/3/12 order granting Reed and Lexis defendants' ex-parte application to allow filing of motion for summary judgment vs. plaintiffs.	0.30 170.00/hr	51.00
	- JC	Begin review and analysis of plaintiffs' 26 page uncontroverted facts and conclusions of law supporting motion for summary judgment vs. Sankey defendants, including as to alleged liability of insureds, O. and Y. Taitz, for acts of Sankey defendants on conspiracy and vicarious liability bases.	0.60 170.00/hr	102.00
4/4/2012	- JC	Continue review and analysis of 8 page declaration of plaintiff, P. Berg, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.50 170.00/hr	85.00
	- JC	Begin review and analysis of 8 page declaration of L. Simmons, with 20 pages of attached exhibits, supporting motion for summary judgment by Lexis Nexis defendants, as to plaintiffs' first amended complaint.	0.60 170.00/hr	102.00
	- JC	Continue review and analysis of lengthy (99 pages) exhibits to declaration of plaintiff, L. Liberi, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.70 170.00/hr	119.00
	- JC	Begin review and analysis of lengthy (203 pages) exhibits for declaration of plaintiff, P. Berg, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.60 170.00/hr	102.00
	- JC	Continue review and analysis of lengthy (125 pages) exhibits for declaration of plaintiff, L. Ostella, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.70 170.00/hr	119.00
	- JC	Continue review and analysis of plaintiffs' 27 page Memorandum of Points and Authorities supporting motion for summary judgment vs. Sankey defendants, including as to alleged liability of insureds, O. and Y. Taitz, for acts of Sankey defendants on conspiracy and vicarious liability bases.	0.80 170.00/hr	136.00
4/5/2012	- JC	Begin review and analysis of lengthy Memorandum of Points and Authorities supporting motion for summary judgment by Lexis Nexis defendants, as to plaintiffs' first amended complaint.	0.50 170.00/hr	85.00
	- JC	Continue review and analysis of plaintiffs' 26 page uncontroverted facts and conclusions of law supporting motion for summary judgment vs. Sankey defendants, including as to	0.70 170.00/hr	119.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
	alleged liability of insureds, O. and Y. Taitz, for acts of Sankey defendants on conspiracy and vicarious liability bases.		
4/5/2012 - JC	Continue review and analysis of lengthy (203 pages) exhibits for declaration of plaintiff, P. Berg, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.70 170.00/hr	119.00
- JC	Continue review and analysis of lengthy (19 pages) declaration of plaintiff, L. Liberi, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.60 170.00/hr	102.00
- JC	Begin review and analysis of declaration of L. Policastro supporting motion for summary judgment by Lexis Nexis defendants, as to plaintiffs' first amended complaint.	0.40 170.00/hr	68.00
- JC	Finalize review and analysis of 9 page declaration of plaintiff, L. Ostella, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.30 170.00/hr	51.00
4/6/2012 - JC	Begin review and analysis of 4 page declaration of defendant, N. Sankey, plus 17 pages of attached exhibits, supporting Lexis defendants' motion for summary judgment vs plaintiffs, including as to key issue of public sources for allegedly private information of plaintiffs on which liability of insured, O.Taitz, is alleged.	0.50 170.00/hr	85.00
- JC	Finalize review and analysis of 8 page declaration of plaintiff, P. Berg, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.30 170.00/hr	51.00
- JC	Continue review and analysis of lengthy (99 pages) exhibits to declaration of plaintiff, L. Liberi, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.90 170.00/hr	153.00
- JC	Continue review and analysis of 8 page declaration of L. Simmons, with 20 pages of attached exhibits, supporting motion for summary judgment by Lexis Nexis defendants, as to plaintiffs' first amended complaint.	0.60 170.00/hr	102.00
- JC	Begin review and analysis of Lexis defendants' 26 page uncontroverted facts and conclusions of law supporting motion for summary judgment vs plaintiffs, including as to alleged conspiracy and vicarious liability for alleged acts of insured, O. Taitz.	0.60 170.00/hr	102.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
4/6/2012 -	JC	Continue review and analysis of lengthy (125 pages) exhibits for declaration of plaintiff, L. Ostella, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.90 170.00/hr	153.00
4/7/2012 -	JC	Continue review and analysis of lengthy Memorandum of Points and Authorities supporting motion for summary judgment by Lexis Nexis defendants, as to plaintiffs' first amended complaint.	0.50 170.00/hr	85.00
4/9/2012 -	JC	Continue review and analysis of plaintiffs' 27 page Memorandum of Points and Authorities supporting motion for summary judgment vs. Sankey defendants, including as to alleged liability of insureds, O. and Y. Taitz, for acts of Sankey defendants on conspiracy and vicarious liability bases.	0.70 170.00/hr	119.00
-	JC	Finalize review and analysis of lengthy (19 pages) declaration of plaintiff, L. Liberi, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.40 170.00/hr	68.00
-	JC	Continue review and analysis of plaintiffs' 26 page uncontroverted facts and conclusions of law supporting motion for summary judgment vs. Sankey defendants, including as to alleged liability of insureds, O. and Y. Taitz, for acts of Sankey defendants on conspiracy and vicarious liability bases.	0.60 170.00/hr	102.00
-	JC	Continue review and analysis of 4 page declaration of defendant, N. Sankey, plus 17 pages of attached exhibits, supporting Lexis defendants' motion for summary judgment vs plaintiffs, including as to key issue of public sources for allegedly private information of plaintiffs on which liability of insured, O.Taitz, is alleged.	0.60 170.00/hr	102.00
-	JC	Continue review and analysis of lengthy (203 pages) exhibits for declaration of plaintiff, P. Berg, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.80 170.00/hr	136.00
-	MLC	Telephone call to the Pennsylvania State Bar Disciplinary Board to inquire on results of Philip Berg's disciplinary hearing on 02/10/12.	0.10 95.00/hr	9.50
-	JC	Continue review and analysis of Lexis defendants' 26 page uncontroverted facts and conclusions of law supporting motion for summary judgment vs plaintiffs, including as to alleged conspiracy and vicarious liability for alleged acts of insured, O. Taitz.	0.70 170.00/hr	119.00
4/10/2012 -	JC	Continue review and analysis of Lexis defendants' 26 page uncontroverted facts and conclusions of law supporting motion for summary judgment vs plaintiffs, including as to alleged	0.60 170.00/hr	102.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	conspiracy and vicarious liability for alleged acts of insured, O. Taitz.		
4/10/2012 - JC	Finalize review and analysis of lengthy (99 pages) exhibits to declaration of plaintiff, L. Liberi, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.60 170.00/hr	102.00
- JC	Finalize review and analysis of lengthy Memorandum of Points and Authorities supporting motion for summary judgment by Lexis Nexis defendants, as to plaintiffs' first amended complaint.	0.50 170.00/hr	85.00
- JC	Finalize review and analysis of 8 page declaration of L. Simmons, with 20 pages of attached exhibits, supporting motion for summary judgment by Lexis Nexis defendants, as to plaintiffs' first amended complaint.	0.40 170.00/hr	68.00
- JC	Finalize review and analysis of lengthy (125 pages) exhibits for declaration of plaintiff, L. Ostella, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.70 170.00/hr	119.00
4/11/2012 - JC	Finalize review and analysis of plaintiffs' 27 page Memorandum of Points and Authorities supporting motion for summary judgment vs. Sankey defendants, including as to alleged liability of insureds, O. and Y. Taitz, for acts of Sankey defendants on conspiracy and vicarious liability bases.	0.60 170.00/hr	102.00
- JC	Finalize review and analysis of plaintiffs' 26 page uncontroverted facts and conclusions of law supporting motion for summary judgment vs. Sankey defendants, including as to alleged liability of insureds, O. and Y. Taitz, for acts of Sankey defendants on conspiracy and vicarious liability bases.	0.40 170.00/hr	68.00
- JC	Finalize review and analysis of lengthy (203 pages) exhibits for declaration of plaintiff, P. Berg, supporting plaintiffs' motion for summary judgment vs. Sankey defendants, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.70 170.00/hr	119.00
- JC	Continue review and analysis of numerous cases cited by appellees in their answering brief in appeal by insured, O. Taitz, and defendant, Defend Our Freedoms Foundation (represented by insured), from denial of joint anti-SLAPP motion to strike, toward preparation of insured's reply brief on appeal.	1.90 170.00/hr	323.00
- JC	Continue drafting of lengthy reply brief of insured, O. Taitz, in appeal by insured and defendant, Defend Our Freedoms Foundations (represented by insured), from denial of joint anti-SLAPP motion to strike.	2.80 170.00/hr	476.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/11/2012	- JC	Multiple telephone conference with insured, O. Taitz, in appeal by insured and defendant, Defend Our Freedoms Foundations (represented by insured), from denial of joint anti-SLAPP motion to strike, toward preparation of coordinated reply briefs in appeal.	0.30 170.00/hr	51.00
	- JC	Continue review and analysis of 4 page declaration of defendant, N. Sankey, plus 17 pages of attached exhibits, supporting Lexis defendants' motion for summary judgment vs plaintiffs, including as to key issue of public sources for allegedly private information of plaintiffs on which liability of insured, O.Taitz, is alleged.	0.50 170.00/hr	85.00
	- JC	Continue review and analysis of declaration of L. Policastro supporting motion for summary judgment by Lexis Nexis defendants, as to plaintiffs' first amended complaint.	0.30 170.00/hr	51.00
	- KS	Telephone call with client regarding finalizing response.	0.20 170.00/hr	34.00
4/12/2012	- JC	Continue review and analysis of numerous cases cited by appellees in their answering brief in appeal by insured, O. Taitz, and defendant, Defend Our Freedoms Foundation (represented by insured), from denial of joint anti-SLAPP motion to strike, toward preparation of insured's reply brief on appeal.	4.20 170.00/hr	714.00
	- JC	Finalize review and analysis of Lexis defendants' 26 page uncontroverted facts and conclusions of law supporting motion for summary judgment vs plaintiffs, including as to alleged conspiracy and vicarious liability for alleged acts of insured, O. Taitz.	0.50 170.00/hr	85.00
	- JC	Continue drafting of lengthy reply brief of insured, O. Taitz, in appeal by insured and defendant, Defend Our Freedoms Foundations (represented by insured), from denial of joint anti-SLAPP motion to strike.	3.10 170.00/hr	527.00
4/13/2012	- JC	Continue review and analysis of numerous cases cited by appellees in their answering brief regarding appellate court jurisdiction in appeal by insured, O. Taitz, and defendant, Defend Our Freedoms Foundation (represented by insured), from denial of joint anti-SLAPP motion to strike, toward preparation of insured's reply brief on appeal addressing issue.	1.50 170.00/hr	255.00
	- JC	Continue review and analysis of numerous cases cited by appellees in their answering brief regarding application of anti-SLAPP statute in appeal by insured, O. Taitz, and defendant, Defend Our Freedoms Foundation (represented by insured), from denial of joint anti-SLAPP motion to strike, toward preparation of insured's reply brief on appeal addressing issue.	1.80 170.00/hr	306.00
	- JC	Correspondence with insured, O. Taitz, toward preparation of insured's reply brief on appeal.	0.20 170.00/hr	34.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/13/2012	- JC	Begin review and analysis of 14 page motion by defendants, T. Sankey and Sankey Firm Inc., for leave to withdraw deemed admitted Request for Admissions.	0.60 170.00/hr	102.00
	- JC	Begin drafting portion of reply brief of insured, O. Taitz, regarding lack of diversity jurisdiction in appeal from denial of insured's and defendant, Defend Our Freedoms Foundation (represented by insured), anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	1.40 170.00/hr	238.00
4/16/2012	- JC	Multiple correspondence with insured, O. Taitz, toward preparation of insured's reply brief on appeal.	0.30 170.00/hr	51.00
	- JC	Begin development of legal arguments of insured, O. Taitz, under FRCP Rule 12(b)(1) regarding lack of diversity jurisdiction, toward support of insured's reply brief in appeal from denial of anti-SLAPP motion to dismiss complaint.	0.80 170.00/hr	136.00
	-	[REDACTED]		
	- JC	Begin review and analysis of 100 page reporter's transcript toward development of legal arguments of insured, O. Taitz, under FRCP Rule 12(b)(1) regarding lack of diversity jurisdiction, toward support of insured's reply brief in appeal from denial of anti-SLAPP motion to dismiss complaint.	1.10 170.00/hr	187.00
	- JC	Continue drafting portion of reply brief of insured, O. Taitz, regarding lack of diversity jurisdiction in appeal from denial of insured's and defendant, Defend Our Freedoms Foundation (represented by insured), anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	2.60 170.00/hr	442.00
	- JC	Begin review and analysis of 15 page declaration of defendant, T. Sankey, and proposed Request for Admissions responses by T. Sankey and Sankey Firm Inc., supporting their motion for leave to withdraw deemed admitted Request for Admissions.	0.60 170.00/hr	102.00
	- JC	Finalize review and analysis of 4 page declaration of defendant, N. Sankey, plus 17 pages of attached exhibits, supporting Lexis defendants' motion for summary judgment vs plaintiffs, including as to key issue of public sources for allegedly private information of plaintiffs on which liability of insured, O. Taitz, is alleged.	0.40 170.00/hr	68.00
	- JC	Continue review and analysis of 14 page motion by defendants, T. Sankey and Sankey Firm Inc., for leave to withdraw deemed admitted Request for Admissions.	0.70 170.00/hr	119.00
4/17/2012	- JC	Continue review and analysis of 15 page declaration of defendant, T. Sankey, and proposed Request for Admissions responses by T. Sankey and Sankey Firm Inc., supporting their	0.70 170.00/hr	119.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	motion for leave to withdraw deemed admitted Request for Admissions.		
4/17/2012 - JC	Begin drafting portion of reply brief of insured, O. Taitz, regarding record on appeal and arguments made in lower court, in appeal from denial of insured's and defendant, Defend Our Freedoms Foundation (represented by insured), anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	0.70 170.00/hr	119.00
4/18/2012 - JC	Continue drafting portion of reply brief of insured, O. Taitz, regarding record on appeal and arguments made in lower court, in appeal from denial of insured's and defendant, Defend Our Freedoms Foundation (represented by insured), anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	0.80 170.00/hr	136.00
- JC	Receipt and review of court's 4/17/12 minute order regarding Sankey defendants' motion for relief from deemed admitted Request for Admissions.	0.30 170.00/hr	51.00
4/19/2012 - JC	Finalize drafting portion of reply brief of insured, O. Taitz, regarding plaintiffs' burden in opposition to anti-SLAPP, in appeal from denial of insured's and defendant, Defend Our Freedoms Foundation (represented by insured), anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	0.90 170.00/hr	153.00
- JC	Several lengthy telephone conferences with insured, O. Taitz, in her capacity as counsel for defendant, Defend Our Freedoms Foundation, regarding drafting of insured's and DOFF's related reply briefs in appeal from denial of insured's and DOFF's joint anti-SLAPP motion to strike.	0.50 170.00/hr	85.00
- JC	Finalize drafting portion of reply brief of insured, O. Taitz, regarding defendants' burden under anti-SLAPP statute, in appeal from denial of insured's and defendant, Defend Our Freedoms Foundation (represented by insured), anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	1.50 170.00/hr	255.00
- JC	Multiple correspondence with insured, O. Taitz, in her capacity as counsel for defendant, Defend Our Freedoms Foundation, regarding counsel's proposed request for judicial notice in appeal from denial of insured's and DOFF's joint anti-SLAPP motion to strike.	0.30 170.00/hr	51.00
- MLC	Review and revise Reply Brief by Appellant, Orly Taitz, pursuant to carrier authority from Laurie Johnson.	1.10 95.00/hr	104.50
- JC	Begin review and analysis of P. Berg's 12 page declaration regarding plaintiffs' opposition to Sankey defendants' motion for leave to withdraw deemed admitted Request for Admissions,	0.50 170.00/hr	85.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
		including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.		
4/19/2012	- MLC	Draft Table of Contents and Table of Authorities for Reply Brief by Appellant, Orly Taitz, pursuant to carrier authority from Laurie Johnson.	1.60 95.00/hr	152.00
	- KS	Conference regarding finalized response.	0.30 170.00/hr	51.00
	- JC	Begin review and analysis of plaintiffs' 18 page Memorandum of Points and Authorities in opposition to Sankey defendants' motion for leave to withdraw deemed admitted Request for Admissions, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.40 170.00/hr	68.00
	- JC	Finalize drafting portion of reply brief of insured, O. Taitz, regarding record on appeal and arguments made in lower court, in appeal from denial of insured's and defendant, Defend Our Freedoms Foundation (represented by insured), anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	1.30 170.00/hr	221.00
	- KS	Telephone call with client.	0.20 170.00/hr	34.00
	- KS	Telephone call with client.	0.20 170.00/hr	34.00
	- MLC	Telephone call from client regarding status of reply brief.	0.10 95.00/hr	9.50
4/20/2012	- JC	Begin review and analysis of lengthy (28 pages) exhibits to declaration of witness, B. Liberi (husband of plaintiff, L. Liberi), in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants and toward evaluation of L. Liberi's claimed damages.	0.50 170.00/hr	85.00
	- JC	Begin review and analysis of lengthy (82 pages) exhibits to declaration of plaintiff, L. Ostella, in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants.	0.50 170.00/hr	85.00
	- JC	Begin review and analysis of lengthy (370 pages) exhibits to declaration of plaintiff, P. Berg, in support of plaintiffs' motion for summary judgment against several Sankey defendants, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants and toward evaluation of L. Liberi's claimed damages.	0.60 170.00/hr	102.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/20/2012	- JC	Receipt and review of 4/19/12 request to court by all Reed Elsevier defendants for continuance of hearing on their motion for summary judgment, with reference to stay regarding appeal by insured, O. Taitz, and defendant, Defend Our Freedoms Foundations, Inc.	0.30 170.00/hr	51.00
	- JC	Continue review and analysis of P. Berg's 12 page declaration regarding plaintiffs' opposition to Sankey defendants' motion for leave to withdraw deemed admitted Request for Admissions, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.50 170.00/hr	85.00
	- JC	Begin review and analysis of plaintiffs' 25 page Memorandum of Points and Authorities in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants.	0.60 170.00/hr	102.00
	- JC	Begin review of reply brief of defendant, Defend Our Freedoms Foundation (represented by insured, O. Taitz), filed on 4/19/12 in appeal from denial of insured's and DOFF's joint anti-SLAPP motion to strike.	0.50 170.00/hr	85.00
	- JC	Begin review and analysis of 22 page declaration of plaintiff, L. Liberi, in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants.	0.50 170.00/hr	85.00
4/21/2012	- JC	Begin review and analysis of 11 page declaration of witness, F. Ostella (husband of plaintiff, L. Ostella), in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants and toward evaluation of L. Liberi's claimed damages.	0.40 170.00/hr	68.00
	- JC	Continue review and analysis of plaintiffs' 18 page Memorandum of Points and Authorities in opposition to Sankey defendants' motion for leave to withdraw deemed admitted Request for Admissions, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.70 170.00/hr	119.00
	- JC	Begin review and analysis of 9 page declaration of witness, B. Liberi (husband of plaintiff, L. Liberi), in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants and toward evaluation of L. Liberi's claimed damages.	0.40 170.00/hr	68.00
	- JC	Begin review and analysis of plaintiffs' 16 page evidentiary objections and request to strike declarations and documentary evidence, in opposition to Reed defendants' motion for summary	0.50 170.00/hr	85.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
	judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz.		
4/21/2012 - JC	Begin review and analysis of 12 page declaration of plaintiff, L. Ostella, in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants.	0.50 170.00/hr	85.00
4/23/2012 - JC	Continue review and analysis of plaintiffs' 16 page evidentiary objections and request to strike declarations and documentary evidence, in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz.	0.60 170.00/hr	102.00
- JC	Continue review and analysis of lengthy (82 pages) exhibits to declaration of plaintiff, L. Ostella, in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants.	0.80 170.00/hr	136.00
- JC	Continue review and analysis of 11 page declaration of witness, F. Ostella (husband of plaintiff, L. Ostella), in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants and toward evaluation of L. Liberi's claimed damages.	0.50 170.00/hr	85.00
- JC	Receipt and review two 4/20/12 correspondences of counsel for Reed Elsevier defendants, regarding request to set scheduling conference regarding June 2012 trial, and upcoming hearings on motions for summary judgment.	0.30 170.00/hr	51.00
- JC	Continue review and analysis of lengthy (370 pages) exhibits to declaration of plaintiff, P. Berg, in support of plaintiffs' motion for summary judgment against several Sankey defendants, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants and toward evaluation of L. Liberi's claimed damages.	0.70 170.00/hr	119.00
- JC	Continue review and analysis of P. Berg's 12 page declaration regarding plaintiffs' opposition to Sankey defendants' motion for leave to withdraw deemed admitted Request for Admissions, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.40 170.00/hr	68.00
- JC	Finalize review and analysis of plaintiffs' 18 page Memorandum of Points and Authorities in opposition to Sankey defendants' motion for leave to withdraw deemed admitted Request for Admissions, including as relevant to insured, O. Taitz's alleged conspiracy based liability regarding Sankey defendants.	0.40 170.00/hr	68.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
4/23/2012	- JC	Begin review and analysis of plaintiffs' motion to strike portions of reply brief of insured, O. Taitz, and for sanctions, in appeal by insured and defendant, Defend Our Freedoms Foundations, from denial of anti-SLAPP motion to strike complaint.	0.40 170.00/hr	68.00
	- JC	Continue review and analysis of plaintiffs' 25 page Memorandum of Points and Authorities in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants.	0.70 170.00/hr	119.00
	- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of request for judicial notice in appeal by insured and defendant, Defend Our Freedoms Foundations (represented by O. Taitz), from denial of anti-SLAPP motion to strike complaint.	0.30 170.00/hr	51.00
	- JC	Begin review and analysis of plaintiffs' 53 page Statement of Genuine Disputes of Material Facts in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants.	0.70 170.00/hr	119.00
4/24/2012	- KS	Telephone call with client.	0.20 170.00/hr	34.00
	- JC	Continue review and analysis of 12 page declaration of plaintiff, L. Ostella, in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants.	0.70 170.00/hr	119.00
	- JC	Continue review and analysis of lengthy (28 pages) exhibits to declaration of witness, B. Liberi (husband of plaintiff, L. Liberi), in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants and toward evaluation of L. Liberi's claimed damages.	0.80 170.00/hr	136.00
	- JC	Begin review and analysis of appellees' motion to strike portions of reply brief of defendant, Defend Our Freedoms Foundations (represented by insured, O. Taitz), and to impose sanctions, in appeal by insured and DOFF from denial of joint anti-SLAPP motion, and toward preparation of coordinated opposition to such motion.	0.40 170.00/hr	68.00
	- JC	Begin review and analysis of 39 page declaration of plaintiff, P. Berg, in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants.	0.60 170.00/hr	102.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/24/2012	- KS	Correspondence with carrier regarding Reply Brief.	0.20 170.00/hr	34.00
	- JC	Continue review and analysis of plaintiffs' 25 page Memorandum of Points and Authorities in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants.	0.70 170.00/hr	119.00
	- JC	Continue review and analysis of 9 page declaration of witness, B. Liberi (husband of plaintiff, L. Liberi), in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants and toward evaluation of L. Liberi's claimed damages.	0.50 170.00/hr	85.00
	- JC	Receipt and review court of appeals' 4/24/12 order regarding filing and service by insured, O. Taitz, of reply brief and related documents in appeal from denial of anti-SLAPP motion to strike complaint.	0.20 170.00/hr	34.00
	- JC	Continue review and analysis of 22 page declaration of plaintiff, L. Liberi, in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants.	0.90 170.00/hr	153.00
	- JC	Continue review and analysis of appellees' motion to strike portions of reply brief of insured, O. Taitz, and to impose sanctions, toward preparation of opposition to such motion.	0.50 170.00/hr	85.00
4/25/2012	- JC	Continue review and analysis of plaintiffs' 53 page Statement of Genuine Disputes of Material Facts in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants.	0.80 170.00/hr	136.00
	- JC	Telephone conference with opposing counsel for Lexis Nexis defendants regarding request for insured, O. Taitz, to submit declaration supporting Lexis reply to plaintiffs' opposition to Lexis motion for summary judgment.	0.20 170.00/hr	34.00
	- JC	Begin review and analysis of plaintiffs' 16 page evidentiary objections and request to strike declarations and documentary evidence, in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz.	0.30 170.00/hr	51.00
	- JC	Review court's 4/25/12 order vacating trial date, setting Case Management Conference and continuing hearings on various motions for summary judgment.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/25/2012	- JC	Receipt and review stipulation and proposed order regarding hearing on motions for summary judgment by Lexis Nexis defendants and plaintiffs.	0.30 170.00/hr	51.00
	- JC	Continue review and analysis of lengthy (82 pages) exhibits to declaration of plaintiff, L. Ostella, in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants.	0.60 170.00/hr	102.00
	- JC	Continue review and analysis of lengthy (370 pages) exhibits to declaration of plaintiff, P. Berg, in support of plaintiffs' motion for summary judgment against several Sankey defendants, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants and toward evaluation of L. Liberi's claimed damages.	0.40 170.00/hr	68.00
	- JC	Finalize review and analysis of 11 page declaration of witness, F. Ostella (husband of plaintiff, L. Ostella), in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants and toward evaluation of L. Liberi's claimed damages.	0.30 170.00/hr	51.00
4/26/2012	- JC	Continue review and analysis of plaintiffs' 53 page Statement of Genuine Disputes of Material Facts in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants.	0.80 170.00/hr	136.00
	- JC	Finalize review and analysis of 9 page declaration of witness, B. Liberi (husband of plaintiff, L. Liberi), in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants and toward evaluation of L. Liberi's claimed damages.	0.30 170.00/hr	51.00
	- JC	Finalize review and analysis of 12 page declaration of plaintiff, L. Ostella, in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants.	0.30 170.00/hr	51.00
	- JC	Continue review and analysis of 39 page declaration of plaintiff, P. Berg, in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants.	0.80 170.00/hr	136.00
	- JC	Finalize review and analysis of lengthy (28 pages) exhibits to declaration of witness, B. Liberi (husband of plaintiff, L. Liberi), in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability	0.40 170.00/hr	68.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	claims against insured, O. Taitz, regarding all other defendants and toward evaluation of L. Liberi's claimed damages.		
4/26/2012 - JC	Begin drafting of comprehensive update for carrier regarding status of appeals, discovery, trial and related dates, various motions for summary judgment, and updated analysis of plaintiffs' alleged damages.	0.70 170.00/hr	119.00
- JC	Finalize review and analysis of plaintiffs' 25 page Memorandum of Points and Authorities in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants.	0.50 170.00/hr	85.00
- JC	Finalize review and analysis of 22 page declaration of plaintiff, L. Liberi, in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants.	0.50 170.00/hr	85.00
4/27/2012 - JC	Finalize review and analysis of lengthy (370 pages) exhibits to declaration of plaintiff, P. Berg, in support of plaintiffs' motion for summary judgment against several Sankey defendants, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants and toward evaluation of L. Liberi's claimed damages.	0.30 170.00/hr	51.00
- JC	Finalize review and analysis of plaintiffs' 53 page Statement of Genuine Disputes of Material Facts in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants.	0.60 170.00/hr	102.00
- JC	Finalize review and analysis of lengthy (82 pages) exhibits to declaration of plaintiff, L. Ostella, in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants.	0.40 170.00/hr	68.00
- KS	Meeting with carrier regarding status.	0.50 170.00/hr	85.00
- JC	Continue review and analysis of 39 page declaration of plaintiff, P. Berg, in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and vicarious liability claims against insured, O. Taitz, regarding all other defendants.	0.70 170.00/hr	119.00
4/28/2012 - JC	Finalize review and analysis of 39 page declaration of plaintiff, P. Berg, in opposition to Reed defendants' motion for summary judgment, including as relevant to plaintiffs' conspiracy and	0.60 170.00/hr	102.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	vicarious liability claims against insured, O. Taitz, regarding all other defendants.		
4/29/2012 - JC	Begin review and analysis of Sankey defendants' reply Memorandum of Points and Authorities, regarding their motion for leave to withdraw deemed admitted Request for Admissions, and toward evaluation of insured, O. Taitz's alleged conspiracy based and vicarious liability regarding Sankey defendants.	0.40 170.00/hr	68.00
- JC	Correspondence with insured, O. Taitz (also counsel for defendant, Defend Our Freedoms Foundations), toward preparation of insured's and DOFF's opposition memoranda to plaintiffs' motions to strike insured's and DOFF's reply briefs in appeals from denial of their joint anti-SLAPP motion, and in opposition to plaintiffs' requests for sanctions.	0.20 170.00/hr	34.00
4/30/2012 -			
- JC	Multiple correspondence with insured, O. Taitz (also counsel for defendant, Defend Our Freedoms Foundations), toward preparation of insured's and DOFF's opposition memoranda to plaintiffs' motions to strike insured's and DOFF's reply briefs in appeals from denial of their joint anti-SLAPP motion, and in opposition to plaintiffs' requests for sanctions.	0.30 170.00/hr	51.00
- JC	Review of plaintiffs' counsel's 4/30/12 two correspondence to court, requesting leave to file discovery motion regarding Reed defendants, and to compel compliance with Subpoena Duces Tecum to IRB Research.	0.30 170.00/hr	51.00
- JC	Continue review and analysis of Sankey defendants' reply Memorandum of Points and Authorities, regarding their motion for leave to withdraw deemed admitted Request for Admissions, and toward evaluation of insured, O. Taitz's alleged conspiracy based and vicarious liability regarding Sankey defendants.	0.40 170.00/hr	68.00
- JC	Begin drafting of portion of comprehensive update for carrier addressing plaintiffs' various alleged damages, and new information regarding damages gained via plaintiffs' motion for summary judgment vs. Sankey defendants.	0.50 170.00/hr	85.00
- KS	Conference regarding client's opposition.	0.40 170.00/hr	68.00
5/1/2012 - JC	Review of motion for leave to supplement record on appeal, or for judicial notice, by defendant, Defend Our Freedoms Foundations (represented by insured, O. Taitz), in appeal by insured and DOFF from denial of joint anti-SLAPP motion to strike Complaint.	0.50 170.00/hr	85.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
5/1/2012 -	JC	Begin drafting of Memorandum of Points and Authorities by insured, O. Taitz, in opposition to plaintiffs' motions to strike insured's reply brief in appeals from denial of anti-SLAPP motion, and in opposition to plaintiffs' requests for sanctions, pursuant to carrier authority from Laurie Johnson.	4.30 170.00/hr 731.00
-	JC	Begin review and analysis of numerous legal authorities cited by plaintiffs in their motion to strike reply brief of insured, O. Taitz, in appeal from denial of anti-SLAPP motion, and toward drafting of insured's opposition to plaintiffs' motion.	1.80 170.00/hr 306.00
-	JC	Begin review and analysis of 8 page declaration of P. Berg regarding plaintiffs' motion to strike and for sanctions in appeal by Defend Our Freedoms Foundations (represented by insured, O. Taitz), from denial of insured's and DOFF's joint anti-SLAPP motion to strike complaint.	0.40 170.00/hr 68.00
-	JC	Correspondence with insured, O. Taitz (in capacity as counsel for co-appellant Defend Our Freedoms Foundations Inc.), regarding preparation of coordinated oppositions by insured and DOFF to Plaintiffs' motions to strike insured's and DOFF's reply briefs in appeals from joint anti-SLAPP motion to strike.	0.20 170.00/hr 34.00
5/2/2012 -	JC	Multiple correspondence with insured, O. Taitz (in capacity as counsel for co-appellant Defend Our Freedoms Foundations Inc.), regarding counsel's proposal to seek sanctions against Plaintiffs regarding their motions to strike insured's and DOFF's reply briefs in appeals from joint anti-SLAPP motion to strike.	0.30 170.00/hr 51.00
-	JC	Continue drafting of Memorandum of Points and Authorities by insured, O. Taitz, in opposition to plaintiffs' motions to strike insured's reply brief in appeals from denial of anti-SLAPP motion, and in opposition to plaintiffs' requests for sanctions, pursuant to carrier authority from Laurie Johnson.	2.10 170.00/hr 357.00
-	JC	Continue review and analysis of numerous legal authorities cited by plaintiffs in their motion to strike reply brief of insured, O. Taitz, in appeal from denial of anti-SLAPP motion, and toward drafting of insured's opposition to plaintiffs' motion.	1.70 170.00/hr 289.00
-	[REDACTED]		[REDACTED]
-	[REDACTED]		[REDACTED]
-	JC	Continue review and analysis of 8 page declaration of P. Berg regarding plaintiffs' motion to strike and for sanctions in appeal by Defend Our Freedoms Foundations (represented by insured, O. Taitz), from denial of insured's and DOFF's joint anti-SLAPP motion to strike complaint.	0.30 170.00/hr 51.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
5/3/2012 -	JC	Finalize drafting of Memorandum of Points and Authorities by insured, O. Taitz, in opposition to plaintiffs' motions to strike insured's reply brief in appeals from denial of anti-SLAPP motion, and in opposition to plaintiffs' requests for sanctions, pursuant to carrier authority from Laurie Johnson.	1.40 170.00/hr 238.00
-	MLC	Review and revise Opposition by Orly Taitz to Motion to Strike Portions of Orly Taitz's Reply Brief, pursuant to carrier authority from Laurie Johnson.	0.70 95.00/hr 66.50
-	KS	Correspondence with carrier regarding client's request for sanctions.	0.30 170.00/hr 51.00
-	MLC	Prepare Table of Contents and Table of Authorities for Opposition by Orly Taitz to Motion to Strike Portions of Orly Taitz's Reply Brief, pursuant to carrier authority from Laurie Johnson.	1.10 95.00/hr 104.50
5/4/2012 -	JC	Begin review and analysis of 16 page Memorandum of Points and Authorities by plaintiffs in reply to insured, O. Taitz's opposition to plaintiffs' motion to strike brief and for sanctions, in consolidated appeal by insured and defendant, Defend Our Freedoms Foundation, from denial of joint anti-SLAPP motion to strike plaintiffs' complaint.	0.50 170.00/hr 85.00
-	JC	Begin review and analysis of lengthy Memorandum of Points and Authorities and declarations by insured, O. Taitz (as counsel for defendant, Defend Our Freedoms Foundations), in opposition to plaintiffs' motion to strike DOFF's reply brief and for sanctions, in appeal by insured and DOFF from denial of joint anti-SLAPP motion to strike complaint.	0.50 170.00/hr 85.00
-	KS	Correspondence with carrier regarding appeal.	0.20 170.00/hr 34.00
-	KS	Conference with carrier regarding discovery.	0.20 170.00/hr 34.00
5/5/2012 -	JC	Continue review and analysis of 16 page Memorandum of Points and Authorities by plaintiffs in reply to insured, O. Taitz's opposition to plaintiffs' motion to strike brief and for sanctions, in consolidated appeal by insured and defendant, Defend Our Freedoms Foundation, from denial of joint anti-SLAPP motion to strike plaintiffs' complaint.	0.60 170.00/hr 102.00
-	JC	Begin review and analysis of 22 page Memorandum of Points and Authorities by plaintiffs in opposition to request for judicial notice by defendant, Defend Our Freedoms Foundation (represented by insured, O. Taitz), in consolidated appeal by DOFF and insured from denial of joint anti-SLAPP motion to strike plaintiffs' complaint.	0.60 170.00/hr 102.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
5/6/2012 -	JC	Begin review and analysis of plaintiffs' 10 page reply Memorandum of Points and Authorities regarding opposition of defendant, Defend Our Freedoms Foundations (represented by insured, O. Taitz), to plaintiffs' motion to strike reply brief of DOFF in appeals by insured and DOFF from denial of their joint anti-SLAPP motion to strike complaint.	0.50 170.00/hr 85.00
5/7/2012 -	JC	Continue review and analysis of plaintiffs' 10 page reply Memorandum of Points and Authorities regarding opposition of defendant, Defend Our Freedoms Foundations (represented by insured, O. Taitz), to plaintiffs' motion to strike reply brief of DOFF in appeals by insured and DOFF from denial of their joint anti-SLAPP motion to strike complaint.	0.40 170.00/hr 68.00
-	KS	Conference regarding client's request that we prepare reply brief.	0.40 170.00/hr 68.00
-	JC	Finalize review and analysis of 16 page Memorandum of Points and Authorities by plaintiffs in reply to insured, O. Taitz's opposition to plaintiffs' motion to strike brief and for sanctions, in consolidated appeal by insured and defendant, Defend Our Freedoms Foundation, from denial of joint anti-SLAPP motion to strike plaintiffs' complaint.	0.40 170.00/hr 68.00
-	JC	Begin review and analysis of Sankey defendants' 17 page Memorandum of Points and Authorities in opposition to plaintiffs' motion for summary judgment, including as regarding alleged liability of insured, O. Taitz.	0.40 170.00/hr 68.00
-	JC	Continue review and analysis of 22 page Memorandum of Points and Authorities by plaintiffs in opposition to request for judicial notice by defendant, Defend Our Freedoms Foundation (represented by insured, O. Taitz), in consolidated appeal by DOFF and insured from denial of joint anti-SLAPP motion to strike plaintiffs' complaint.	0.70 170.00/hr 119.00
-	JC	Begin review and analysis of Sankey defendants' evidentiary objections to plaintiffs' declarations supporting their motion for summary judgment vs. Sankey defendants.	0.30 170.00/hr 51.00
5/8/2012 -	JC	Begin review and analysis of 14 page declaration of M. Miller supporting Lexis Nexis defendants' motion for summary judgment vs. plaintiffs, including as to alleged liability of insured, O. Taitz.	0.40 170.00/hr 68.00
-	JC	Begin review and analysis of 14 page declaration with exhibits of defendant, T. Sankey, supporting Sankey defendants' opposition to plaintiffs' motion for summary judgment, including as regarding alleged liability of insured, O. Taitz.	0.40 170.00/hr 68.00
-	JC	Begin review and analysis of Lexis Nexis defendants' 30 page Memorandum of Points and Authorities in opposition to plaintiffs' request to strike evidence and evidentiary objections regarding	0.60 170.00/hr 102.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
	defendants' motion for summary judgment vs. plaintiffs, including as to alleged liability of insured, O. Taitz.		
5/8/2012 - JC	Review and analysis of court's 5/8/12 order granting motion of Sankey defendants for leave to withdraw deemed admitted Request for Admissions, and to serve amended responses, and related vacating by court of plaintiffs' motion for summary judgment vs. Sankey defendants.	0.40 170.00/hr	68.00
- JC	Begin drafting of portion of comprehensive update to carrier regarding court's 5/8/12 order granting motion of Sankey defendants for leave to withdraw deemed admitted Request for Admissions, and to serve amended responses, and related vacating by court of plaintiffs' motion for summary judgment vs. Sankey defendants, including regarding effects on defense of insured, O. Taitz.	0.40 170.00/hr	68.00
- JC	Begin review and analysis of Lexis Nexis defendants' 20 page reply Memorandum of Points and Authorities regarding their motion for summary judgment vs. plaintiffs, including as to alleged liability of insured, O. Taitz.	0.50 170.00/hr	85.00
- JC	Continue review and analysis of Sankey defendants' evidentiary objections to plaintiffs' declarations supporting their motion for summary judgment vs. Sankey defendants.	0.20 170.00/hr	34.00
- JC	Continue review and analysis of Sankey defendants' 17 page Memorandum of Points and Authorities in opposition to plaintiffs' motion for summary judgment, including as regarding alleged liability of insured, O. Taitz.	0.60 170.00/hr	102.00
- JC	Begin review and analysis of declaration of M. Colen in support of Sankey defendants' opposition to plaintiffs' motion for summary judgment, including as regarding alleged liability of insured, O. Taitz.	0.40 170.00/hr	68.00
- JC	Begin review and analysis of Sankey defendants' 9 page responding separate statement regarding plaintiffs' motion for summary judgment vs. Sankey defendants.	0.40 170.00/hr	68.00
5/9/2012 - JC	Continue review and analysis of Sankey defendants' 9 page responding separate statement regarding plaintiffs' motion for summary judgment vs. Sankey defendants.	0.30 170.00/hr	51.00
- JC	Review and analysis of court of appeals' order on plaintiffs' motions to strike reply briefs and for sanctions in appeals by insured, O. Taitz, and Defend Our Freedoms Foundations (represented by insured) from denial of joint anti-SLAPP motion to strike complaint.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/9/2012 -	JC	Continue review and analysis of Lexis Nexis defendants' 20 page reply Memorandum of Points and Authorities regarding their motion for summary judgment vs. plaintiffs, including as to alleged liability of insured, O. Taitz.	0.50 170.00/hr	85.00
-	JC	Multiple telephone conferences with insured, O. Taitz (as counsel for co-appellant Defend Our Freedoms Foundations) regarding Court of Appeals' 5/9/12 order on plaintiffs' motions to strike reply briefs and for sanctions in appeals by insured and DOFF from denial of joint anti-SLAPP motion to strike complaint.	0.30 170.00/hr	51.00
-	JC	Continue review and analysis of 14 page declaration with exhibits of defendant, T. Sankey, supporting Sankey defendants' opposition to plaintiffs' motion for summary judgment, including as regarding alleged liability of insured, O. Taitz.	0.50 170.00/hr	85.00
-	JC	Continue review and analysis of Lexis Nexis defendants' 30 page Memorandum of Points and Authorities in opposition to plaintiffs' request to strike evidence and evidentiary objections regarding defendants' motion for summary judgment vs. plaintiffs, including as to alleged liability of insured, O. Taitz.	0.50 170.00/hr	85.00
-	JC	Continue drafting of lengthy comprehensive update to carrier regarding status of appeals by insured, O. Taitz, and defendant, Defend Our Freedoms Foundation (represented by insured), including as to pending motions to strike and for sanctions in appeals.	0.60 170.00/hr	102.00
-	JC	Finalize review and analysis of 22 page Memorandum of Points and Authorities by plaintiffs in opposition to request for judicial notice by defendant, Defend Our Freedoms Foundation (represented by insured, O. Taitz), in consolidated appeal by DOFF and insured from denial of joint anti-SLAPP motion to strike plaintiffs' complaint.	0.40 170.00/hr	68.00
-	JC	Finalize review and analysis of Sankey defendants' 17 page Memorandum of Points and Authorities in opposition to plaintiffs' motion for summary judgment, including as regarding alleged liability of insured, O. Taitz.	0.30 170.00/hr	51.00
-	JC	Continue review and analysis of 14 page declaration of M. Miller supporting Lexis Nexis defendants' motion for summary judgment vs. plaintiffs, including as to alleged liability of insured, O. Taitz.	0.40 170.00/hr	68.00
5/10/2012 -	JC	Continue drafting of lengthy comprehensive update to carrier regarding status of various motions for summary judgment and related motions by other parties, vacation of trial and related dates, evaluation of plaintiffs' alleged damages, and preparation for upcoming status conference.	0.50 170.00/hr	85.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/10/2012 -	JC	Finalize review and analysis of 14 page declaration with exhibits of defendant, T. Sankey, supporting Sankey defendants' opposition to plaintiffs' motion for summary judgment, including as regarding alleged liability of insured, O. Taitz.	0.30 170.00/hr	51.00
5/11/2012 -	JC	Finalize review and analysis of Lexis Nexis defendants' 30 page Memorandum of Points and Authorities in opposition to plaintiffs' request to strike evidence and evidentiary objections regarding defendants' motion for summary judgment vs. plaintiffs, including as to alleged liability of insured, O. Taitz.	0.40 170.00/hr	68.00
-	JC	Finalize review and analysis of Lexis Nexis defendants' 20 page reply Memorandum of Points and Authorities regarding their motion for summary judgment vs. plaintiffs, including as to alleged liability of insured, O. Taitz.	0.40 170.00/hr	68.00
-	JC	Begin review and analysis of plaintiffs' 13 page reply memorandum regarding evidentiary objections to evidence of defendant, Reed Elsevier, supporting Reed's motion for summary judgment, including as regarding alleged liability of insured, O. Taitz.	0.50 170.00/hr	85.00
-	JC	Finalize review and analysis of 14 page declaration of M. Miller supporting Lexis Nexis defendants' motion for summary judgment vs. plaintiffs, including as to alleged liability of insured, O. Taitz.	0.30 170.00/hr	51.00
5/12/2012 -	JC	Begin review and analysis of 15 page Memorandum of Points and Authorities, declaration and exhibits by defendant, Defend Our Freedoms Foundation (represented by insured, O. Taitz), in reply to plaintiffs' opposition to DOFF's motion for judicial notice in consolidated appeal by DOFF and insured from denial of joint anti-SLAPP motion to strike plaintiffs' complaint.	0.50 170.00/hr	85.00
-	JC	Begin review and analysis of 25 page declaration of plaintiff, P. Berg, supporting plaintiffs' supplemental opposition to motion for summary judgment of defendant, Reed Elsevier Corporation.	0.60 170.00/hr	102.00
-	JC	Begin review and analysis of plaintiffs' 21 page evidentiary objections to declaration of M. Miller supporting motion for summary judgment of defendant, Reed Elsevier, including as regarding alleged liability of insured, O. Taitz.	0.50 170.00/hr	85.00
5/13/2012 -	JC	Continue review and analysis of plaintiffs' 13 page reply memorandum regarding evidentiary objections to evidence of defendant, Reed Elsevier, supporting Reed's motion for summary judgment, including as regarding alleged liability of insured, O. Taitz.	0.40 170.00/hr	68.00
5/14/2012 -	JC	Begin review and analysis of 35 page declaration of plaintiff, P. Berg with numerous exhibits, as part of plaintiffs' supplemental opposition to motion for judicial notice by defendant, Defend Our Freedoms Foundations (represented by insured, O. Taitz), and	0.60 170.00/hr	102.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	supplemental request for sanctions, in appeal by insured and DOFF from denial of their anti-SLAPP motion to strike regarding plaintiffs' complaint.		
5/14/2012 - JC	Continue review and analysis of 15 page Memorandum of Points and Authorities, declaration and exhibits by defendant, Defend Our Freedoms Foundation (represented by insured, O. Taitz), in reply to plaintiffs' opposition to DOFF's motion for judicial notice in consolidated appeal by DOFF and insured from denial of joint anti-SLAPP motion to strike plaintiffs' complaint.	0.50 170.00/hr	85.00
- JC	Continue review and analysis of plaintiffs' 21 page evidentiary objections to declaration of M. Miller supporting motion for summary judgment of defendant, Reed Elsevier, including as regarding alleged liability of insured, O. Taitz.	0.60 170.00/hr	102.00
- JC	Continue review and analysis of 25 page declaration of plaintiff, P. Berg, supporting plaintiffs' supplemental opposition to motion for summary judgment of defendant, Reed Elsevier Corporation.	0.50 170.00/hr	85.00
- JC	Begin review and analysis of plaintiffs' 14 page supplemental opposition to motion for judicial notice by defendant, Defend Our Freedoms Foundations (represented by insured, O. Taitz), and supplemental request for sanctions, in appeal by insured and DOFF from denial of their anti-SLAPP motion to strike regarding plaintiffs' complaint.	0.50 170.00/hr	85.00
5/15/2012 - JC	Continue review and analysis of 35 page declaration of plaintiff, P. Berg with numerous exhibits, as part of plaintiffs' supplemental opposition to motion for judicial notice by defendant, Defend Our Freedoms Foundations (represented by insured, O. Taitz), and supplemental request for sanctions, in appeal by insured and DOFF from denial of their anti-SLAPP motion to strike regarding plaintiffs' complaint.	0.40 170.00/hr	68.00
- JC	Finalize review and analysis of 25 page declaration of plaintiff, P. Berg, supporting plaintiffs' supplemental opposition to motion for summary judgment of defendant, Reed Elsevier Corporation.	0.40 170.00/hr	68.00
- KS	Finalize status update for carrier.	1.20 170.00/hr	204.00
- JC	Finalize review and analysis of plaintiffs' 21 page evidentiary objections to declaration of M. Miller supporting motion for summary judgment of defendant, Reed Elsevier, including as regarding alleged liability of insured, O. Taitz.	0.30 170.00/hr	51.00
- JC	Continue review and analysis of plaintiffs' 14 page supplemental opposition to motion for judicial notice by defendant, Defend Our Freedoms Foundations (represented by insured, O. Taitz), and supplemental request for sanctions, in appeal by insured and	0.40 170.00/hr	68.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	DOFF from denial of their anti-SLAPP motion to strike regarding plaintiffs' complaint.		
5/16/2012 - JC	Finalize review and analysis of 35 page declaration of plaintiff, P. Berg with numerous exhibits, as part of plaintiffs' supplemental opposition to motion for judicial notice by defendant, Defend Our Freedoms Foundations (represented by insured, O. Taitz), and supplemental request for sanctions, in appeal by insured and DOFF from denial of their anti-SLAPP motion to strike regarding plaintiffs' complaint.	0.40 170.00/hr	68.00
5/17/2012 - JC	Review and analysis of objections and request to strike by defendant, Defend Our Freedoms Foundations (represented by insured, O. Taitz), to plaintiffs' sur-reply memorandum regarding DOFF's request for judicial notice in consolidated appeals by insured and DOFF from denial of joint anti-SLAPP motion to strike.	0.40 170.00/hr	68.00
5/18/2012 - JC	Correspondence with insured, O. Taitz (as counsel for defendant, Defend Our Freedoms Foundations), regarding preparation for upcoming status conference.	0.20 170.00/hr	34.00
5/21/2012 - JC	Begin review and analysis of court's 12 page tentative ruling and order, on motion for summary judgment of defendant, LexisNexis, with detailed findings including as to alleged liability of insured, O. Taitz.	0.50 170.00/hr	85.00
- JC	Begin review and analysis of Sankey defendants' 33 page motion to compel further responses by plaintiff, L. Liberi, to Special Interrogatories and for sanctions, and supporting declaration and exhibits.	0.40 170.00/hr	68.00
- JC	Travel to and from court for trial setting conference, and hearing on motion for summary judgment of defendant, Lexis Nexis.	1.20 170.00/hr	204.00
- JC	Attend trial setting conference.	1.40 170.00/hr	238.00
- JC	Attend hearing on motion for summary judgment by defendant, Lexis Nexis, including as to alleged liability of insured, O. Taitz.	1.40 170.00/hr	238.00
5/22/2012 - JC	Continue review and analysis of Sankey defendants' 33 page motion to compel further responses by plaintiff, L. Liberi, to Special Interrogatories and for sanctions, and supporting declaration and exhibits.	0.40 170.00/hr	68.00
- JC	Receipt and review of court's notices of filing deficiencies regarding three motions to compel further responses to discovery by Sankey defendants, as against all plaintiffs.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/22/2012	- JC	Begin review and analysis of Sankey defendants' 32 page motion to compel further responses by plaintiff, L. Ostella, to Special Interrogatories and for sanctions, and supporting declaration and exhibits.	0.40 170.00/hr	68.00
	- JC	Begin review and analysis of Sankey defendants' 30 page motion to compel further responses by plaintiff, P. Berg, to Special Interrogatories and for sanctions, and supporting declaration and exhibits.	0.40 170.00/hr	68.00
	- KS	Conference regarding Court's rulings.	0.30 170.00/hr	51.00
5/23/2012	- JC	Begin review and analysis of court's 12 page order with findings of fact and law granting motion for summary judgment of defendant, Lexis Nexis, including as to alleged liability of insured, O. Taitz.	0.40 170.00/hr	68.00
	- JC	Continue review and analysis of Sankey defendants' 30 page motion to compel further responses by plaintiff, P. Berg, to Special Interrogatories and for sanctions, and supporting declaration and exhibits.	0.40 170.00/hr	68.00
5/24/2012	- KS	Preparation of update to carrier.	0.20 170.00/hr	34.00
	- JC	Continue review and analysis of Sankey defendants' 32 page motion to compel further responses by plaintiff, L. Ostella, to Special Interrogatories and for sanctions, and supporting declaration and exhibits.	0.40 170.00/hr	68.00
	- JC	Finalize review and analysis of Sankey defendants' 33 page motion to compel further responses by plaintiff, L. Liberi, to Special Interrogatories and for sanctions, and supporting declaration and exhibits.	0.30 170.00/hr	51.00
	- JC	Continue review and analysis of court's 12 page order with findings of fact and law granting motion for summary judgment of defendant, Lexis Nexis, including as to alleged liability of insured, O. Taitz.	0.30 170.00/hr	51.00
5/25/2012	- JC	Finalize review and analysis of Sankey defendants' 30 page motion to compel further responses by plaintiff, P. Berg, to Special Interrogatories and for sanctions, and supporting declaration and exhibits.	0.20 170.00/hr	34.00
5/26/2012	- JC	Finalize review and analysis of Sankey defendants' 32 page motion to compel further responses by plaintiff, L. Ostella, to Special Interrogatories and for sanctions, and supporting declaration and exhibits.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/28/2012 -	JC	Begin drafting of update with attorney analysis regarding Trial Setting Conference, motion for summary judgment by Lexis Nexis defendants, impact on insured's defense, plaintiffs' proposed motion to set aside dismissal of Reed defendants, impact on insured's defense, and related issues.	0.50 170.00/hr	85.00
5/29/2012 -	JC	Review correspondence and related notice by Sankey Defendants regarding their motions to compel discovery as against plaintiffs, and resetting hearing on motions.	0.30 170.00/hr	51.00
-	JC	Finalize drafting of update with attorney analysis regarding Trial Setting Conference, motion for summary judgment by Lexis Nexis defendants, impact on insured's defense, plaintiffs' proposed motion to set aside dismissal of Reed defendants, impact on insured's defense, and related issues.	0.30 170.00/hr	51.00
-	JC	Begin review and analysis of plaintiffs' 5/29/12 correspondence requesting leave to file FRCP Rule 60 motion for relief from judgment, regarding dismissal of Reed defendants.	0.30 170.00/hr	51.00
5/30/2012 -	KS	Finalize update to carrier.	0.30 170.00/hr	51.00
5/31/2012 -	KS	Meeting with carrier regarding status and handling.	0.30 170.00/hr	51.00
6/5/2012 -	JC	Begin review and analysis of Sankey defendants' 29 page Memorandum of Points and Authorities supporting their amended motion to compel further responses by Plaintiff, L. Liberi, to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.70 170.00/hr	119.00
6/6/2012 -	JC	Review court's order regarding amendment to Sankey defendants' motions to compel regarding Special Interrogatories to all plaintiffs.	0.30 170.00/hr	51.00
-	JC	Several correspondence with all counsel regarding plaintiffs' meet and confer correspondence regarding motion for leave to file second amended complaint, and defendants' responses to meet and confer correspondence.	0.50 170.00/hr	85.00
-	JC	Begin review and analysis of Sankey defendants' 35 page separate statement supporting their amended motion to compel further responses by Plaintiff, L. Liberi, to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.80 170.00/hr	136.00
6/7/2012 -	JC	Continue review and analysis of Sankey defendants' 29 page Memorandum of Points and Authorities supporting their amended motion to compel further responses by Plaintiff, L. Liberi, to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.60 170.00/hr	102.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
6/7/2012	- JC	Begin review and analysis of Sankey defendants' 35 page Memorandum of Points and Authorities supporting their amended motion to compel further responses by Plaintiff, P. Berg to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.70 170.00/hr	119.00
	- JC	Begin review and analysis of Sankey defendants' 50 page declaration and exhibits supporting their amended motion to compel further responses by Plaintiff, P. Berg to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.80 170.00/hr	136.00
6/8/2012	- JC	Continue review and analysis of Sankey defendants' 35 page separate statement supporting their amended motion to compel further responses by Plaintiff, L. Liberi, to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.70 170.00/hr	119.00
	- JC	Continue review and analysis of Sankey defendants' 35 page Memorandum of Points and Authorities supporting their amended motion to compel further responses by Plaintiff, P. Berg to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.70 170.00/hr	119.00
6/11/2012	- JC	Finalize review and analysis of Sankey defendants' 29 page Memorandum of Points and Authorities supporting their amended motion to compel further responses by Plaintiff, L. Liberi, to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.40 170.00/hr	68.00
	- JC	Continue review and analysis of Sankey defendants' 50 page declaration and exhibits supporting their amended motion to compel further responses by Plaintiff, P. Berg to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.80 170.00/hr	136.00
	- JC	Begin review and analysis of Sankey defendants' 57 page declaration and exhibits supporting their amended motion to compel further responses by Plaintiff, L. Ostella, to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.80 170.00/hr	136.00
6/12/2012	- JC	Finalize review and analysis of Sankey defendants' 35 page separate statement supporting their amended motion to compel further responses by Plaintiff, L. Liberi, to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.60 170.00/hr	102.00
	- JC	Review court's order denying plaintiffs' request for leave to file amendment to first amended complaint.	0.30 170.00/hr	51.00
	- JC	Finalize review and analysis of Sankey defendants' 35 page Memorandum of Points and Authorities supporting their amended motion to compel further responses by Plaintiff, P.	0.40 170.00/hr	68.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
	Berg to Special Interrogatories, including as to alleged liability of insured, O. Taitz.		
6/12/2012 - JC	Begin review and analysis of Sankey defendants' 34 page Memorandum of Points and Authorities supporting their amended motion to compel further responses by Plaintiff, L. Ostella, to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.70 170.00/hr	119.00
6/13/2012 - JC	Continue review and analysis of Sankey defendants' 57 page declaration and exhibits supporting their amended motion to compel further responses by Plaintiff, L. Ostella, to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.70 170.00/hr	119.00
- JC	Finalize review and analysis of Sankey defendants' 50 page declaration and exhibits supporting their amended motion to compel further responses by Plaintiff, P. Berg to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.60 170.00/hr	102.00
6/14/2012 - JC	Multiple correspondence with insured, O. Taitz (also counsel for various defendants) regarding voluminous materials regarding Pennsylvania State Bar disciplinary proceeding against plaintiffs' counsel, P. Berg, toward development of impeachment evidence and support for potential motion to revoke pro hac vice status of plaintiffs' counsel in federal court case.	0.30 170.00/hr	51.00
- JC	Begin review and analysis of voluminous materials of greater than 300 pages, including hearing transcript of over 200 pages, regarding Pennsylvania State Bar disciplinary proceeding against plaintiffs' counsel, P. Berg, toward development of impeachment evidence and support for potential motion to revoke pro hac vice status of plaintiffs' counsel in federal court case.	0.60 170.00/hr	102.00
- JC	Continue review and analysis of Sankey defendants' 34 page Memorandum of Points and Authorities supporting their amended motion to compel further responses by Plaintiff, L. Ostella, to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.70 170.00/hr	119.00
6/15/2012 - JC	Finalize review and analysis of Sankey defendants' 57 page declaration and exhibits supporting their amended motion to compel further responses by Plaintiff, L. Ostella, to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.40 170.00/hr	68.00
6/17/2012 - JC	Multiple correspondence with insured, O. Taitz, and other defense counsel, regarding Sankey defendants' motions to compel responses to interrogatories by all plaintiffs.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/18/2012 -	JC	Begin review and analysis of plaintiffs' 25 page Memorandum of Points and Authorities in opposition to Sankey defendants' amended motion to compel further response by Plaintiff, P. Berg, to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.60 170.00/hr	102.00
6/19/2012 -	JC	Begin review and analysis of plaintiffs' 25 page Memorandum of Points and Authorities in opposition to Sankey defendants' amended motion to compel further response by Plaintiff, L. Ostella, to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.60 170.00/hr	102.00
-	JC	Begin review and analysis of plaintiff, P. Berg's 47 page declaration and exhibits in opposition to Sankey defendants' amended motions to compel further responses by Plaintiffs to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.80 170.00/hr	136.00
-	JC	Begin review and analysis of plaintiff, L. Liberi's 7 page declaration and exhibits in opposition to Sankey defendants' amended motions to compel further responses by all Plaintiffs to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.50 170.00/hr	85.00
-	JC	Begin review and analysis of plaintiff, L. Liberi's 4 page declaration and exhibits in opposition to Sankey defendants' amended motions to compel further responses by L. Liberi to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.40 170.00/hr	68.00
-	JC	Finalize review and analysis of Sankey defendants' 34 page Memorandum of Points and Authorities supporting their amended motion to compel further responses by Plaintiff, L. Ostella, to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.40 170.00/hr	68.00
6/20/2012 -	JC	Begin review and analysis of plaintiffs' 25 page Memorandum of Points and Authorities in opposition to Sankey defendants' amended motion to compel further response by Plaintiff, L. Liberi to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.60 170.00/hr	102.00
-	JC	Continue review and analysis of plaintiffs' 25 page Memorandum of Points and Authorities in opposition to Sankey defendants' amended motion to compel further response by Plaintiff, P. Berg, to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.50 170.00/hr	85.00
-	JC	Continue review and analysis of plaintiffs' 25 page Memorandum of Points and Authorities in opposition to Sankey defendants' amended motion to compel further response by plaintiff, L.	0.60 170.00/hr	102.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
		Ostella, to Special Interrogatories, including as to alleged liability of insured, O. Taitz.		
6/21/2012	- JC	Continue review and analysis of plaintiff, P. Berg's 47 page declaration and exhibits in opposition to Sankey defendants' amended motions to compel further responses by Plaintiffs to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.80 170.00/hr	136.00
	- JC	Multiple correspondence with insured, O. Taitz (also as counsel for appellant, Defend Our Freedoms), regarding proposal for request for judicial notice of District Court findings on motion for summary judgment of Lexis defendants, in consolidated appeals by insured and Defend Our Freedoms.	0.30 170.00/hr	51.00
6/22/2012	- JC	Finalize review and analysis of plaintiffs' 25 page Memorandum of Points and Authorities in opposition to Sankey defendants' amended motion to compel further response by Plaintiff, L. Ostella, to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.40 170.00/hr	68.00
	- JC	Multiple correspondence with insured, O. Taitz (also as counsel for appellant, Defend Our Freedoms), regarding development of impeachment evidence against plaintiffs regarding State Bar disciplinary proceeding against plaintiff, P. Berg.	0.30 170.00/hr	51.00
	- JC	Continue review and analysis of plaintiffs' 25 page Memorandum of Points and Authorities in opposition to Sankey defendants' amended motion to compel further response by Plaintiff, L. Liberi to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.60 170.00/hr	102.00
6/23/2012	- JC	Finalize review and analysis of plaintiff, P. Berg's 47 page declaration and exhibits in opposition to Sankey defendants' amended motions to compel further responses by Plaintiffs to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.40 170.00/hr	68.00
	- JC	Finalize review and analysis of plaintiffs' 25 page Memorandum of Points and Authorities in opposition to Sankey defendants' amended motion to compel further response by Plaintiff, P. Berg, to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.30 170.00/hr	51.00
6/25/2012	- JC	Finalize review and analysis of plaintiffs' 25 page Memorandum of Points and Authorities in opposition to Sankey defendants' amended motion to compel further response by Plaintiff, L. Liberi to Special Interrogatories, including as to alleged liability of insured, O. Taitz.	0.40 170.00/hr	68.00
	- JC	Begin drafting of evaluation of legal issues for carrier regarding proposed request for judicial notice of summary judgment order and findings, in appeal by insured, O. Taitz and defendant,	0.50 170.00/hr	85.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
		Defend Our Freedoms Foundation, from denial of anti-SLAPP motion to strike.		
6/28/2012 -	KS	Finalize update to carrier regarding Appeal.	0.30 170.00/hr	51.00
6/29/2012 -	KS	Authority from adjuster, Laurie Johnson, regarding request for authorization.	0.10 170.00/hr	17.00
-	JC	Begin evaluation of legal issues regarding potential request for judicial notice of district court's summary judgment order, supporting appeals by insured and defendant, Defend Our Freedoms Foundation (represented by insured), in consolidated appeals from denial of anti-SLAPP motion.	0.80 170.00/hr	136.00
-	JC	Multiple correspondence with adjuster Laurie Johnson regarding authority to evaluate legal issues regarding potential request for judicial notice of district court's summary judgment order, supporting appeals by insured and defendant, Defend Our Freedoms Foundation.	0.30 170.00/hr	51.00
7/3/2012 -	JC	Begin analysis of complex legal issues regarding potential request for judicial notice of District Court summary judgment, and findings adverse to plaintiffs, in appeals by insured, O. Taitz, and defendant, Defend Our Freedoms Foundations (represented by insured), from appeals from denial of anti-SLAPP motion, pursuant to authority of adjuster Laurie Johnson.	0.90 170.00/hr	153.00
7/6/2012 -	JC	Begin review and analysis of request for judicial notice by appellant, Defend Our Freedoms Foundation (represented by insured and appellant, O. Taitz), and voluminous supporting documents and exhibits (approximately 200 pages) in DOFF's and insured's appeal from denial of joint anti-SLAPP motion.	1.10 170.00/hr	187.00
7/9/2012 -	JC	Continue review and analysis of request for judicial notice by appellant, Defend Our Freedoms Foundation (represented by insured and appellant, O. Taitz), and voluminous supporting documents and exhibits (approximately 200 pages) in DOFF's and insured's appeal from denial of joint anti-SLAPP motion.	0.80 170.00/hr	136.00
-	JC	Begin review and analysis of plaintiffs' 20 page opposition to motion by insured, O. Taitz (as counsel for appellant, Defend Our Freedoms Foundation), for judicial notice of district court's motion for summary judgment findings in consolidated appeals by insured and DOFF from denial of joint anti-SLAPP motion to strike.	0.50 170.00/hr	85.00
7/10/2012 -	JC	Continue review and analysis of plaintiffs' 20 page opposition to motion by insured, O. Taitz (as counsel for appellant, Defend Our Freedoms Foundation), for judicial notice of district court's motion for summary judgment findings in consolidated appeals	0.50 170.00/hr	85.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	by insured and DOFF from denial of joint anti-SLAPP motion to strike.		
7/11/2012 - JC	Finalize review and analysis of request for judicial notice by appellant, Defend Our Freedoms Foundation (represented by insured and appellant, O. Taitz), and voluminous supporting documents and exhibits (approximately 200 pages) in DOFF's and insured's appeal from denial of joint anti-SLAPP motion.	0.40 170.00/hr	68.00
7/13/2012 - JC	Review and analysis of court's 7/9/12 order denying several motions to compel discovery by Sankey defendants.	0.30 170.00/hr	51.00
- JC	Meeting with insured, O. Taitz (also as counsel for defendant, Defend Our Freedoms Foundation), regarding drafting of reply to plaintiffs' opposition to insured's and DOFF's request for judicial notice in consolidated appeals by insured and DOFF from denial of joint anti-SLAPP motion.	0.40 170.00/hr	68.00
- JC	Begin drafting of reply Memorandum of Points and Authorities of insured, O. Taitz and defendant, Defend Our Freedoms Foundation (represented by insured) to plaintiffs' opposition to request for judicial notice in consolidated appeals by insured and DOFF from denial of joint anti-SLAPP motion, pursuant to carrier authority from Laurie Johnson.	1.80 170.00/hr	306.00
7/14/2012 - KS	Telephone call from client regarding appeal.	0.20 170.00/hr	34.00
7/15/2012 - KS	Conference regarding client's filings.	0.20 170.00/hr	34.00
7/17/2012 - JC	Begin review and analysis of reply Memorandum of Points and Authorities (14 pages) by appellant, Defend Our Freedoms Foundation (represented by insured and appellant, O. Taitz), to opposition to its request for judicial notice in DOFF's and insured's appeal from denial of joint anti-SLAPP motion.	0.70 170.00/hr	119.00
- KS	Conference with client regarding appeal.	0.20 170.00/hr	34.00
7/19/2012 - JC	Continue review and analysis of reply Memorandum of Points and Authorities (14 pages) by appellant, Defend Our Freedoms Foundation (represented by insured and appellant, O. Taitz), to opposition to its request for judicial notice in DOFF's and insured's appeal from denial of joint anti-SLAPP motion.	0.60 170.00/hr	102.00
7/26/2012 - JC	Begin drafting of comprehensive update to carrier regarding status of appeals, discovery and future handling issues.	0.40 170.00/hr	68.00
8/2/2012 - JC	Begin review and analysis of Ninth Circuit Court of Appeals Rules regarding procedure for application to bar P. Berg as Plaintiffs' counsel in appeals by insured, O. Taitz (also counsel	0.40 170.00/hr	68.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
		for co-defendant, Defend Our Freedoms Foundation), and DOFF regarding State Bar suspension of opposing counsel P. Berg.		
8/2/2012 -	JC	Begin evaluation of procedural devices to seek removal of Plaintiff's counsel, P. Berg, from District Court and Court of Appeals cases after State Bar suspension of P. Berg, including potential motion to revoke proposed hace vice status of remove P. Berg.	0.40 170.00/hr	68.00
-	JC	Multiple telephone conference with insured, O. Taitz (also counsel for co-defendant, Defend Our Freedoms Foundation), regarding State Bar suspension of opposing counsel P. Berg, and effect in appeal by insured and DOFF, including regarding potential motion to remove P. Berg as opposing counsel in appeals by insured and DOFF.	0.30 170.00/hr	51.00
-	JC	Multiple correspondence with insured, O. Taitz (also counsel for co-defendant, Defend Our Freedoms Foundation), regarding State Bar suspension of opposing counsel P. Berg, and effect in appeal by insured and DOFF, including regarding potential motion to remove P. Berg as opposing counsel in appeals by insured and DOFF.	0.30 170.00/hr	51.00
8/4/2012 -	JC	Multiple correspondence with insured, O. Taitz (also counsel for co-defendant, Defend Our Freedoms Foundation), regarding State Bar suspension of opposing counsel P. Berg, and effect in appeal by insured and DOFF, including regarding potential motion to revoke P. Berg's admission to Ninth Circuit in appeals by insured and DOFF.	0.30 170.00/hr	51.00
8/6/2012 -				
8/8/2012 -	KS	Conference regarding strategy regarding disbarment of plaintiff's counsel.	0.40 170.00/hr	68.00
8/9/2012 -	EA	Analyze email sent to us regarding Motion to Disqualify Plaintiff's Counsel	3.10 170.00/hr	527.00
-	JC	Begin review and analysis of Plaintiff's response to request by insured, O. Taitz (also counsel for co-defendant, Defend Our Freedoms Foundation), and DOFF to remove P. Berg as Plaintiffs' counsel in appeals after suspension of P. Berg by State Bar.	0.30 170.00/hr	51.00
8/10/2012 -	JC	Multiple telephone conferences with Pennsylvania State Bar regarding status of disciplinary action vs. P. Berg, toward preparation of reply of insured, O. Taitz (also counsel for co-defendant, Defend Our Freedoms Foundation), and DOFF to Plaintiffs' response to insured's and DOFF's request to Ninth	0.30 170.00/hr	51.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	Circ. Court of Appeals to remove P. Berg as Plaintiffs' counsel in appeals after suspension of P. Berg by State Bar.		
8/10/2012 - JC	Begin review of docket in appeals by insured, O. Taitz and Defend Our Freedoms Foundation (represented by insured), regarding status of G. Krep as counsel for Appellees and toward potential application to disqualify G. Krep as counsel.	0.30 170.00/hr	51.00
- JC	Draft correspondence to Court of Appeals regarding response to reply to insured, O. Taitz (also counsel for co-defendant, Defend Our Freedoms Foundation), and DOFF request to to remove P. Berg as Plaintiffs' counsel in appeals after suspension of P. Berg by State Bar.	0.20 170.00/hr	34.00
- JC	Multiple correspondence with insured, O. Taitz (also counsel for co-defendant, Defend Our Freedoms Foundation), regarding provisional withdrawal of request to remove Plaintiffs' counsel P. Berg in appeals and regarding status of State Bar disciplinary proceeding vs. P. Berg.	0.30 170.00/hr	51.00
- KS	Conference regarding notice to Court of Appeals.	0.20 170.00/hr	34.00
8/13/2012 - JC	Begin review and analysis of Ninth Circuit rules regarding motion for Order to Show Cause regarding suspension or removal of plaintiffs' counsel P. Berg in appeals by insured, O. Taitz (also counsel for co-defendant, Defend Our Freedoms Foundation), and DOFF, following provisional suspension of P. Berg by Pennsylvania State Bar.	0.50 170.00/hr	85.00
- JC	Begin drafting summary and analysis for carrier regarding status of various discovery motions, and requests for judicial notice in appeals by insured, O. Taitz (also counsel for co-defendant, Defend Our Freedoms Foundation), and DOFF from denial of anti-SLAPP motion.	0.40 170.00/hr	68.00
- JC	Begin review and analysis of 17 page report and findings of Pennsylvania State Bar in disciplinary proceeding against Plaintiff's counsel, P. Berg, toward support for potential motion in appeals by insured, O. Taitz (also counsel for co-defendant, Defend Our Freedoms Foundation), and DOFF for removal of P. Berg as Plaintiffs' counsel in appeals.	0.50 170.00/hr	85.00
8/14/2012 - JC	Begin review and analysis of plaintiffs' 8/13/12 response with 95 pages of exhibits to Court of Appeals regarding request by insured, O. Taitz (also counsel for co-defendant, Defend Our Freedoms Foundation), and DOFF, for removal of Plaintiffs' counsel P. Berg following provisional suspension of P. Berg by Pennsylvania State Bar.	0.90 170.00/hr	153.00
- JC	Continue review and analysis of 17 page report and findings of Pennsylvania State Bar in disciplinary proceeding against Plaintiff's counsel, P. Berg, toward support for potential motion in	0.40 170.00/hr	68.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
	appeals by insured, O. Taitz (also counsel for co-defendant, Defend Our Freedoms Foundation), and DOFF for removal of P. Berg as Plaintiffs' counsel in appeals.		
8/14/2012 - JC	Draft insured's reply to plaintiffs' 8/13/12 correspondence to Court of Appeals regarding request by insured, O. Taitz (also counsel for co-defendant, Defend Our Freedoms Foundation), and DOFF, for removal of Plaintiffs' counsel P. Berg following provisional suspension of P. Berg by Pennsylvania State Bar.	0.30 170.00/hr	51.00
- KS	Conference regarding response to Berg's filing.	0.20 170.00/hr	34.00
- KS	Conference regarding our filing and opposing counsel's response. Need for supplemental note.	0.20 170.00/hr	34.00
8/15/2012 - JC	Continue review and analysis of 17 page report and findings of Pennsylvania State Bar in disciplinary proceeding against Plaintiff's counsel, P. Berg, toward support for potential motion in appeals by insured, O. Taitz (also counsel for co-defendant, Defend Our Freedoms Foundation), and DOFF for removal of P. Berg as Plaintiffs' counsel in appeals.	0.50 170.00/hr	85.00
- JC	Begin review of opposing counsel's 8/15/12 correspondence to Court of Appeals regarding removal of Plaintiffs' counsel regarding Pennsylvania State Bar disciplinary proceeding, and threatened motion for sanctions in appeals by insured, O. Taitz (also as counsel for Defend Our Freedoms Foundations), and DOFF, regarding request for removal.	0.40 170.00/hr	68.00
- JC	Multiple correspondence with insured, O. Taitz (also as counsel for Defend Our Freedoms Foundations), regarding Plaintiff's 8/15/12 correspondence to Court of Appeals regarding request for removal of Plaintiff's counsel regarding Pennsylvania State Bar disciplinary proceeding, and threatened motion for sanctions in appeals by insured and DOFF, regarding request for removal.	0.30 170.00/hr	51.00
8/16/2012 - JC	Multiple correspondence with insured, O. Taitz (also as counsel for Defend Our Freedoms Foundations), regarding proposed new request for judicial notice regarding report issued in Pennsylvania State Bar disciplinary proceeding against plaintiff P. Berg (also as counsel for all defendants).	0.30 170.00/hr	51.00
- KS	Amend update to client regarding response to opposing counsel.	0.30 170.00/hr	51.00
8/17/2012 - KS	Conference regarding client's requests for response to opposing counsel.	0.40 170.00/hr	68.00
- KS	Amend analysis for client.	0.60 170.00/hr	102.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
8/23/2012 -	KS	Meeting with carrier regarding future handling.	0.40 170.00/hr	68.00
9/3/2012 -	JC	Begin evaluation of complex legal issues regarding proposed request for judicial notice by insured, O. Taitz, and defendant, Defend Our Freedoms Foundations (represented by insured), in consolidated appeals by insured and DOFF from denial of anti-SLAPP motion to strike, of order of Pennsylvania State Bar regarding plaintiff's counsel, P. Berg, toward support of appeal.	0.80 170.00/hr	136.00
9/5/2012 -	JC	Continue evaluation of complex legal issues regarding proposed request for judicial notice by insured, O. Taitz, and defendant, Defend Our Freedoms Foundations (represented by insured), in consolidated appeals by insured and DOFF from denial of anti-SLAPP motion to strike, of order of Pennsylvania State Bar regarding plaintiff's counsel, P. Berg, toward support of appeal.	0.90 170.00/hr	153.00
9/7/2012 -	JC	Multiple correspondence with insured, O. Taitz (also counsel for defendant, Defend Our Freedoms Foundations) regarding proposed request for judicial notice by insured and Defend Our Freedoms Foundations, in consolidated appeals by insured and DOFF from denial of anti-SLAPP motion to strike, of order of Pennsylvania State Bar regarding plaintiff's counsel, P. Berg, toward support of appeal.	0.30 170.00/hr	51.00
-	JC	Continue evaluation of complex legal issues regarding proposed request for judicial notice by insured, O. Taitz, and defendant, Defend Our Freedoms Foundations (represented by insured), in consolidated appeals by insured and DOFF from denial of anti-SLAPP motion to strike, of order of Pennsylvania State Bar regarding plaintiff's counsel, P. Berg, toward support of appeal.	1.20 170.00/hr	204.00
9/10/2012 -	JC	Review order referring appellees' request for sanctions regarding request for judicial notice to panel of justices in appeal by insured, O. Taitz, and Defend Our Freedoms Foundation (represented by insured) from denial of anti-SLAPP motion.	0.30 170.00/hr	51.00
9/12/2012 -	KS	Conference regarding client's continued requests related to Berg's pending disbarment.	0.30 170.00/hr	51.00
9/14/2012 -	KS	Conference with carrier regarding update.	0.20 170.00/hr	34.00
-	JC	Review court's 9/13/12 order granting Sankey defendants' request for leave to file motions to compel and motion for summary judgment vs. plaintiffs.	0.30 170.00/hr	51.00
-	JC	Draft status update for carrier regarding District Court and Court of Appeals cases, including regarding Sankey defendants' motion for summary judgment and several motions to compel regarding discovery to plaintiffs, and analysis of impact on insured, O. Taitz.	0.40 170.00/hr	68.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/14/2012	- KS	Finalize update to carrier.	0.20 170.00/hr	34.00
9/21/2012	- JC	Multiple correspondence with insured O. Taitz (also as counsel for defendant, Defend Our Freedoms Foundations) regarding oral arguments in disciplinary proceeding against plaintiffs' counsel, toward potential use for judicial notice in appeal by insured and Defend Our Freedoms Foundations.	0.30 170.00/hr	51.00
9/24/2012	- JC	Review opposing counsel's 9/22/12 correspondence to court, and related correspondence to all counsel, regarding plaintiffs' request for leave to file motion to compel vs. Sankey defendants and motion regarding protective order regarding discovery to Sankey defendants.	0.30 170.00/hr	51.00
9/25/2012	- JC	Review court's 9/24/12 order granting Intelius defendants' request for leave to file memorandum of costs vs. plaintiffs.	0.20 170.00/hr	34.00
	- JC	Review court's 9/24/12 order granting motion for summary judgment of Lexis Nexis defendants.	0.20 170.00/hr	34.00
10/2/2012	- JC	Review order of Pennsylvania court regarding plaintiff's counsel, provided by Sankey Defendants, regarding preparation for upcoming hearing on Order to Show Cause regarding removal of plaintiffs' counsel pursuant to Sankey Defendants' application regarding removal.	0.30 170.00/hr	51.00
	- JC	Correspondence with insured, O. Taitz, regarding preparation for upcoming hearing on Order to Show Cause regarding removal of plaintiffs' counsel.	0.20 170.00/hr	34.00
	- JC	Review court's 10/2/12 order regarding Order to Show Cause to plaintiff's counsel regarding revocation of pro hac vice status, and plaintiffs' and defendants' requests for leave to file discovery motions.	0.30 170.00/hr	51.00
	- JC	Multiple correspondence with counsel for Sankey Defendants regarding preparation for upcoming hearing on Order to Show Cause regarding removal of plaintiffs' counsel.	0.30 170.00/hr	51.00
	- JC	Begin review and analysis of Sankey defendants' application for leave to file motion to remove plaintiffs' counsel, in preparation for upcoming hearing on Order to Show Cause regarding removal.	0.50 170.00/hr	85.00
10/3/2012	- JC	Multiple telephone conferences with insured, O. Taitz (also counsel for defendant, Defend Our Freedoms Foundations), in preparation for upcoming hearing on Order to Show Cause regarding removal of Plaintiffs' counsel P. Berg, and regarding reporting on status of appeals, as ordered by Court.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/4/2012	- KS	Conference regarding court order and mandatory appearance.	0.30 170.00/hr	51.00
	- JC	Begin review and analysis of Pennsylvania Supreme Court website regarding disciplinary proceeding against Plaintiffs' counsel P. Berg, in preparation for upcoming hearing on Order to Show Cause regarding removal of Plaintiffs' counsel, and regarding reporting on status of appeals, as ordered by Court.	0.50 170.00/hr	85.00
	- JC	Multiple correspondence with insured, O. Taitz (also counsel for defendant, Defend Our Freedoms Foundations), in preparation for upcoming hearing on Order to Show Cause regarding removal of Plaintiffs' counsel P. Berg, and regarding reporting on status of appeals, as ordered by Court.	0.30 170.00/hr	51.00
10/5/2012	- JC	Begin review and analysis of declaration of plaintiff, L. Liberi, and supporting exhibits (23 pages) in response to Order to Show Cause regarding revocation of opposing counsel's proposed hac vice status, and toward preparation for upcoming hearing on Order to Show Cause and status conference regarding appeal by insured.	0.80 170.00/hr	136.00
10/6/2012	- JC	Begin review and analysis of declaration of plaintiff, L. Ostella, and supporting exhibits (14 pages) in response to Order to Show Cause regarding revocation of opposing counsel's proposed hac vice status, and toward preparation for upcoming hearing on Order to Show Cause and status conference regarding appeal by insured.	0.70 170.00/hr	119.00
	- JC	Continue review and analysis of declaration of plaintiff, L. Liberi, and supporting exhibits (23 pages) in response to Order to Show Cause regarding revocation of opposing counsel's proposed hac vice status, and toward preparation for upcoming hearing on Order to Show Cause and status conference regarding appeal by insured.	0.80 170.00/hr	136.00
	- JC	Begin review and analysis of declaration of plaintiff, P. Berg, and supporting exhibits (15 pages) in response to Order to Show Cause regarding revocation of opposing counsel's proposed hac vice status, and toward preparation for upcoming hearing on Order to Show Cause and status conference regarding appeal by insured.	0.70 170.00/hr	119.00
10/8/2012	- KS	Conference regarding future handling related to suspension.	0.20 170.00/hr	34.00
	- JC	Continue review and analysis of declaration of plaintiff, P. Berg, and supporting exhibits (15 pages) in response to Order to Show Cause regarding revocation of opposing counsel's proposed hac vice status, and toward preparation for upcoming hearing on Order to Show Cause and status conference regarding appeal by insured.	0.60 170.00/hr	102.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/8/2012 -	JC	Continue review and analysis of declaration of plaintiff, L. Ostella, and supporting exhibits (14 pages) in response to Order to Show Cause regarding revocation of opposing counsel's proposed hac vice status, and toward preparation for upcoming hearing on Order to Show Cause and status conference regarding appeal by insured.	0.40 170.00/hr	68.00
-	JC	Continue review and analysis of website of Pennsylvania Supreme Court regarding status of disciplinary proceeding against plaintiff, P. Berg (also counsel for all Plaintiff), toward preparation for upcoming hearing on Order to Show Cause regarding revocation of counsel's pro hac vice status and status conference regarding appeal by insured.	0.40 170.00/hr	68.00
-	JC	Begin review and analysis of plaintiffs' motion (10 pages) for leave to bring motion to compel discovery from, and for protective order against, Sankey defendants, and toward preparation for upcoming hearing on various motions and status conference regarding appeal by insured.	0.60 170.00/hr	102.00
-	KS	Correspondence with opposing counsel regarding possible suspension of counsel.	0.40 170.00/hr	68.00
-	JC	Begin review and analysis of detailed response by insured, O. Taitz (also as counsel for appellant, Defend Our Freedoms Foundation), to appellees' motion for sanctions regarding disciplinary action against appellees' counsel, and supporting insured's motion for sanctions against appellees, with approximately 220 pages of exhibits.	1.20 170.00/hr	204.00
10/9/2012 -	JC	Continue review and analysis of plaintiffs' motion (10 pages) for leave to bring motion to compel discovery from, and for protective order against, Sankey defendants, and toward preparation for upcoming hearing on various motions and status conference regarding appeal by insured.	0.40 170.00/hr	68.00
-	JC	Begin review of appellees' application to court of appeals to file motion for Temporary Restraining Order and injunctive relief against insured, O. Taitz (appellant in subject appeal), and for sanctions regarding potential suspension of plaintiffs' counsel in court of appeals.	0.50 170.00/hr	85.00
10/10/2012 -	JC	Begin review and analysis of Sankey defendants' memorandum of evidentiary objections to declaration of plaintiff, L. Liberi, regarding Order to Show Cause for removal of plaintiffs' counsel, toward preparation for upcoming hearing on Order to Show Cause.	0.60 170.00/hr	102.00
-	JC	Begin review and analysis of Sankey defendants' reply Memorandum of Points and Authorities to plaintiffs' response regarding Order to Show Cause for removal of plaintiffs' counsel,	0.80 170.00/hr	136.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	toward preparation for upcoming hearing on Order to Show Cause.		
10/10/2012 - JC	Begin review and analysis of Sankey defendants' Memorandum of Points and Authorities in response to plaintiffs' application for leave to file motions to compel discovery from Sankey defendants, and for protective order, toward preparation for upcoming hearing on application.	0.70 170.00/hr	119.00
- JC	Begin review and analysis of Sankey defendants' memorandum of evidentiary objections to declaration of plaintiff, P. Berg, regarding Order to Show Cause for removal of plaintiffs' counsel, toward preparation for upcoming hearing on Order to Show Cause.	0.50 170.00/hr	85.00
- JC	Begin review and analysis of declaration of Sankey defendants' counsel with exhibits (22 pages) regarding Order to Show Cause for removal of plaintiffs' counsel, toward preparation for upcoming hearing on Order to Show Cause.	0.70 170.00/hr	119.00
- JC	Begin review and analysis of Sankey defendants' memorandum of evidentiary objections to declaration of plaintiff, L. Ostella, regarding Order to Show Cause for removal of plaintiffs' counsel, toward preparation for upcoming hearing on Order to Show Cause.	0.50 170.00/hr	85.00
- JC	Begin review and analysis of detailed response by insured, O. Taitz (also as counsel for appellant, Defend Our Freedoms Foundation), to appellees' motion for sanctions regarding disciplinary action against appellees' counsel, and supporting insured's motion for sanctions against appellees, with approximately 220 pages of exhibits.	1.10 170.00/hr	187.00
10/11/2012 - JC	Continue review and analysis of Sankey defendants' Memorandum of Points and Authorities in response to plaintiffs' application for leave to file motions to compel discovery from Sankey defendants, and for protective order, toward preparation for upcoming hearing on application.	0.50 170.00/hr	85.00
- JC	Continue review and analysis of declaration of Sankey defendants' counsel with exhibits (22 pages) regarding Order to Show Cause for removal of plaintiffs' counsel, toward preparation for upcoming hearing on Order to Show Cause.	0.30 170.00/hr	51.00
10/12/2012 - JC	Finalize review and analysis of detailed response by insured, O. Taitz (also as counsel for appellant, Defend Our Freedoms Foundation), to appellees' motion for sanctions regarding disciplinary action against appellees' counsel, and supporting insured's motion for sanctions against appellees, with approximately 220 pages of exhibits.	0.90 170.00/hr	153.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/15/2012 -	JC	Attend hearing on Case Management Conference, Order to Show Cause for removal of plaintiffs' counsel, and plaintiffs' and Sankey defendants' motions to compel and for protective order in discovery.	3.90 170.00/hr	663.00
-	JC	Travel to and from court for hearing on Case Management Conference, Order to Show Cause for removal of plaintiffs' counsel, and plaintiffs' and Sankey defendants' motions to compel and for protective order in discovery.	1.30 170.00/hr	221.00
10/16/2012 -	JC	Review court's 10/15/12 minute order regarding hearing on Case Management Conference, Order to Show Cause for removal of plaintiffs' counsel, and plaintiffs' and Sankey defendants' motions to compel and for protective order in discovery.	0.30 170.00/hr	51.00
10/18/2012 -	JC	Begin drafting comprehensive update for carrier regarding status of district court and court of appeals cases, including as to plaintiff's counsel's disciplinary matter, regarding Order to Show Cause regarding revocation of pro hac vice status, discovery disputes and motions, and related matters.	1.10 170.00/hr	187.00
10/23/2012 -	KS	Finalize update to carrier.	0.20 170.00/hr	34.00
-	JC	Review website of Pennsylvania Supreme Court for opinion regarding disciplinary matter against Plaintiffs' counsel, P. Berg, regarding court's Order to Show Cause to revoke opposing counsel's pro hac vice status in District Court.	0.30 170.00/hr	51.00
10/24/2012 -	KS	Conference regarding court order and further response as ordered by Judge.	0.60 170.00/hr	102.00
-	JC	Review and analysis of court's 10/22/12 order on Order to Show Cause regarding revocation of opposing counsel's pro hac vice status, and Sankey defendants' and plaintiffs' requests to file motions to compel and for protective order.	0.40 170.00/hr	68.00
-	JC	Review judgment for defendant, Intelius Inc. after granting of its motion for summary judgment on plaintiff's first amended complaint.	0.30 170.00/hr	51.00
10/31/2012 -	KS	Finalize update to carrier.	0.20 170.00/hr	34.00
-	JC	Draft summary and analysis for carrier regarding court's ruling on Order to Show Cause regarding revocation of opposing counsel's pro hac vice status, proposed sanctions against opposing counsel and insured, O. Taitz, and ruling on plaintiffs' and Sankey Defendants' requests for leave to file motion for protective order and motions to compel.	0.40 170.00/hr	68.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/1/2012	- KS	Conference regarding request for attorney's fees.	0.20 170.00/hr	34.00
11/2/2012	- KS	Conference regarding handling of client after Court's order.	0.60 170.00/hr	102.00
	- JC	Review and analysis of defendant, Intelius Corporation's motion to tax costs.	0.40 170.00/hr	68.00
	-	[REDACTED]		
11/16/2012	- JC	Detailed correspondence with insured, O. Taitz (including as counsel for defendant, Defend Our Freedoms Foundations) regarding court's recent order regarding potential disciplinary actions regarding opposing counsel's State Bar proceedings, and regarding potential motion to remove opposing counsel.	0.30 170.00/hr	51.00
	- KS	Finalize response to client regarding proper future handling of sensitive issues.	0.60 170.00/hr	102.00
	- JC	Review multiple entries on website of Pennsylvania Supreme Court regarding pending disciplinary action against opposing counsel for plaintiffs, toward support for motion by insured to remove opposing counsel from case.	0.40 170.00/hr	68.00
11/29/2012	- JC	Review docket and other materials on website of Ninth Circuit Court of Appeals regarding consolidated appeals by insured, O. Taitz and co-defendant, Defend Our Freedoms Foundation, toward preparation of update to carrier regarding status of appeals.	0.30 170.00/hr	51.00
	- JC	Begin drafting of update to carrier regarding status of District Court case, disciplinary proceeding against Plaintiff's counsel, and of appeal.	0.50 170.00/hr	85.00
	- JC	Review website and postings of Pennsylvania Supreme Court regarding disciplinary proceeding against plaintiffs' counsel, P. Berg, toward potential motion to remove P. Berg as plaintiffs' counsel in District Court case and Court of Appeal case.	0.40 170.00/hr	68.00
11/30/2012	- JC	Review 11/29/12 order allowing claimed costs of defendant, Intelius Corporation, as against Plaintiffs.	0.20 170.00/hr	34.00
12/4/2012	- KS	Finalize update to carrier.	0.20 170.00/hr	34.00
12/17/2012	- JC	Telephone conference with court of appeals clerk regarding preparation of Acknowledgement of Hearing Notice for upcoming oral argument in appeal.	0.20 170.00/hr	34.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
12/17/2012	- JC	Begin review and analysis of Notice of Oral Argument regarding appeal by insured, O. Taitz, and Defend Our Freedoms Foundations, from order denying anti-Slapp motion to strike.	0.40 170.00/hr	68.00
12/19/2012	- JC	Correspondence with insured, O. Taitz (as counsel for co-appellant Defend Our Freedoms Foundations), toward preparation for upcoming oral argument in consolidated appeals by insured and DOFF.	0.20 170.00/hr	34.00
	- JC	Draft detailed summary with attorney analysis for carrier regarding status of insured's appeal, and preparations for upcoming oral arguments, and regarding upcoming discovery motions.	0.40 170.00/hr	68.00
	- JC	Telephone conference with court of appeals clerk regarding preparation for upcoming oral argument in appeal.	0.20 170.00/hr	34.00
12/20/2012	- KS	Conference regarding oral arguments.	0.40 170.00/hr	68.00
	- JC	Review acknowledgement of hearing notice by insured, O. Taitz (as counsel for co-appellant Defend Our Freedoms Foundation), in appeal by insured and DOFF.	0.30 170.00/hr	51.00
12/21/2012	- JC	Multiple correspondence with insured, O. Taitz (as counsel for co-appellant Defend Our Freedoms Foundation), regarding preparation for upcoming oral argument in appeal by insured and DOFF.	0.30 170.00/hr	51.00
1/2/2013	- JC	Begin review and analysis of 25 page meet and confer separate statement correspondence of plaintiff's counsel, Exhibit 2 to motion, supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Special Interrogatories and for sanctions.	0.70 170.00/hr	119.00
	- JC	Begin review and analysis of plaintiffs and Sankey defendants' 75 page joint discovery separate statement, with numerous subject Special Interrogatories and Sankeys' responses, and related legal arguments and authorities, regarding plaintiffs' motion to compel further responses to Special Interrogatories.	1.10 170.00/hr	187.00
	- JC	Begin review and analysis of various documents regarding plaintiff L. Liberi criminal case, Exhibit 3 to motion, supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Special Interrogatories and for sanctions.	0.40 170.00/hr	68.00
	- JC	Begin review and analysis of 24 page declaration of L. Simmons of Lexis Nexis defendant and exhibits, supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Special Interrogatories and for sanctions.	0.50 170.00/hr	85.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
1/3/2013 -	JC	0.70 170.00/hr	119.00
	Begin review and analysis of 100 page joint stipulation of counsel, submitted with plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Request for Production of Documents, to produce documents and for sanctions.		
-	JC	0.80 170.00/hr	136.00
	Begin review and analysis of 24 page declaration of plaintiff. P. Berg, supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Special Interrogatories and for sanctions.		
-	JC	0.40 170.00/hr	68.00
	Begin review and analysis of declaration of L. Policastro of Lexis Nexis defendant, supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Special Interrogatories and for sanctions.		
-	JC	0.60 170.00/hr	102.00
	Begin review and analysis of Memorandum of Points and Authorities supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Special Interrogatories and for sanctions.		
-	JC	0.30 170.00/hr	51.00
	Continue review and analysis of various documents regarding plaintiff L. Liberi criminal case, Exhibit 3 to motion, supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Special Interrogatories and for sanctions.		
1/4/2013 -	JC	0.60 170.00/hr	102.00
	Review voluminous records of Pennsylvania Supreme Court regarding disciplinary matter against Plaintiffs' counsel, P. Berg, regarding potential motion in appeal to remove P. Berg as opposing counsel.		
-	JC	0.90 170.00/hr	153.00
	Continue review and analysis of plaintiffs and Sankey defendants' 75 page joint discovery separate statement, with numerous subject Special Interrogatories and Sankeys' responses, and related legal arguments and authorities, regarding plaintiffs' motion to compel further responses to Special Interrogatories.		
-	JC	0.60 170.00/hr	102.00
	Continue review and analysis of Memorandum of Points and Authorities supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Special Interrogatories and for sanctions.		
-	JC	0.40 170.00/hr	68.00
	Begin review and analysis of various emails of defendant, N. Sankey, supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Special Interrogatories and for sanctions.		
-	JC	0.80 170.00/hr	136.00
	Continue review and analysis of 100 page joint stipulation of counsel, submitted with plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Request for		

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		<u>Hrs/Rate</u>	<u>Amount</u>
	Production of Documents, to produce documents and for sanctions.		
1/4/2013 - JC	Begin review and analysis of 22 page declaration of P. Berg supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Request for Production of Documents, to produce documents and for sanctions.	0.60 170.00/hr	102.00
- JC	Begin review and analysis of 25 page meet and confer correspondence of plaintiffs (Exhibit 2 to motion) supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Request for Production of Documents, to produce documents and for sanctions.	0.70 170.00/hr	119.00
- JC	Begin review and analysis of 5 page various documents (Exhibit 3 to motion) supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Request for Production of Documents, to produce documents and for sanctions.	0.40 170.00/hr	68.00
1/5/2013 - JC	Begin review and analysis of various correspondence and orders (plaintiffs' exhibits 8 and 9), supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Special Interrogatories and for sanctions.	0.40 170.00/hr	68.00
- JC	Begin review and analysis of 39 page Reed defendants' declaration and several exhibits (Exhibit 4 to motion) supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Request for Production of Documents, to produce documents and for sanctions.	0.60 170.00/hr	102.00
1/6/2013 - JC	Review and analysis of motion of plaintiffs' counsel, G. Kreep, to withdraw as plaintiffs' counsel in District Court case.	0.40 170.00/hr	68.00
1/7/2013 - JC	Begin review and analysis of plaintiffs' initial Memorandum of Points and Authorities for motion to compel Sankey defendants to provide further responses to plaintiffs' Request for Production of Documents, to produce documents and for sanctions.	0.50 170.00/hr	85.00
- JC	Continue review and analysis of 24 page declaration of plaintiff. P. Berg, supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Special Interrogatories and for sanctions.	0.70 170.00/hr	119.00
- JC	Continue review and analysis of 25 page meet and confer separate statement correspondence of plaintiff's counsel, Exhibit 2 to motion, supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Special Interrogatories and for sanctions.	0.50 170.00/hr	85.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
1/7/2013 -	JC	0.40 170.00/hr	68.00
	Begin review and analysis of various emails to insured, O. Taitz, supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Special Interrogatories and for sanctions.		
-	JC	0.40 170.00/hr	68.00
	Continue review and analysis of 22 page declaration of P. Berg supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Request for Production of Documents, to produce documents and for sanctions.		
-	JC	0.70 170.00/hr	119.00
	Begin review and analysis of supplemental Memorandum of Points and Authorities supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Special Interrogatories, and for sanctions regarding alleged spoliation of evidence.		
-	JC	0.70 170.00/hr	119.00
	Continue review and analysis of 39 page Reed defendants' declaration and several exhibits (Exhibit 4 to motion) supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Request for Production of Documents, to produce documents and for sanctions.		
-	JC	0.40 170.00/hr	68.00
	Continue review and analysis of 24 page declaration of L. Simmons of Lexis Nexis defendant and exhibits, supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Special Interrogatories and for sanctions.		
1/8/2013 -	JC	0.50 170.00/hr	85.00
	Continue review and analysis of plaintiffs and Sankey defendants' 75 page joint discovery separate statement, with numerous subject Special Interrogatories and Sankeys' responses, and related legal arguments and authorities, regarding plaintiffs' motion to compel further responses to Special Interrogatories.		
-	JC	0.30 170.00/hr	51.00
	Continue review and analysis of 25 page meet and confer separate statement correspondence of plaintiff's counsel, Exhibit 2 to motion, supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Special Interrogatories and for sanctions.		
-	JC	0.50 170.00/hr	85.00
	Begin review and analysis of plaintiffs' supplemental Memorandum of Points and Authorities for motion to compel Sankey defendants to provide further responses to plaintiffs' Request for Production of Documents, to produce documents and for sanctions.		
-	JC	0.40 170.00/hr	68.00
	Continue review and analysis of 39 page Reed defendants' declaration and several exhibits (Exhibit 4 to motion) supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Request for Production of Documents, to produce documents and for sanctions.		

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/8/2013	- JC	Begin review and analysis of 5 page L. PolICASTRO (Exhibit 5 to motion) supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Request for Production of Documents, to produce documents and for sanctions.	0.50 170.00/hr	85.00
	- KS	Conference regarding effects of plaintiff's counsel withdrawal.	0.20 170.00/hr	34.00
	- KS	Finalize update to carrier.	0.60 170.00/hr	102.00
	- JC	Continue review and analysis of 25 page meet and confer correspondence of plaintiffs (Exhibit 2 to motion) supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Request for Production of Documents, to produce documents and for sanctions.	0.40 170.00/hr	68.00
1/9/2013	- JC	Review and analysis of court's 1/9/13 order setting hearing regarding status of representation of plaintiffs, and status of insured's appeal.	0.30 170.00/hr	51.00
	- JC	Multiple correspondence with insured regarding preparation for upcoming hearing regarding representation of plaintiffs, and status of insured's appeal.	0.30 170.00/hr	51.00
	- JC	Continue review and analysis of 100 page joint stipulation of counsel, submitted with plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Request for Production of Documents, to produce documents and for sanctions.	0.40 170.00/hr	68.00
1/10/2013	- JC	Continue review and analysis of supplemental Memorandum of Points and Authorities supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Special Interrogatories, and for sanctions regarding alleged spoliation of evidence.	0.60 170.00/hr	102.00
	- JC	Continue review and analysis of 24 page declaration of plaintiff. P. Berg, supporting plaintiffs' motion to compel Sankey defendants to provide further responses to plaintiffs' Special Interrogatories and for sanctions.	0.50 170.00/hr	85.00
	- KS	Conference regarding oral argument.	0.20 170.00/hr	34.00
	- JC	Review and analysis of plaintiffs' request for reconsideration of 1/9/13 order taking plaintiffs' motion to compel responses to Special Interrogatories to Sankey Defendants off-calendar.	0.40 170.00/hr	68.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/10/2013	- JC	Correspondence with client (as counsel for co-appellant, Defend Our Freedoms Foundation), regarding preparation for upcoming oral argument in consolidated appeals.	0.20 170.00/hr	34.00
	- JC	Begin review and analysis of plaintiff's motion to substitute attorney Randall Berg in place of attorney Gary Kreep, regarding plaintiffs' counsel's pro hac vice admission to Ninth Circuit District Court.	0.40 170.00/hr	68.00
1/12/2013	- KS	Conference regarding Monday's hearing.	0.20 170.00/hr	34.00
	- JC	Begin preparation for upcoming hearing regarding status of insured's appeal, and State Bar disciplinary proceeding against plaintiffs' counsel.	0.40 170.00/hr	68.00
1/14/2013	- JC	Multiple correspondence with insured, O. Taitz (as counsel for co-appellant Defend Our Freedoms Foundations), toward preparation for upcoming oral argument in consolidated appeals by insured and DOFF.	0.30 170.00/hr	51.00
	- JC	Multiple correspondence with opposing counsel for Sankey Defendants, regarding new related case filed by plaintiffs and potential motion to transfer case to District Court in California and consolidate with Liberi v. Taitz case.	0.30 170.00/hr	51.00
	- JC	Travel to and from court for status conference, hearing on plaintiffs' motions to compel regarding Special Interrogatories and Request for Production of Documents to Sankey defendants, and hearing regarding plaintiffs' counsel's requests to withdraw from case.	1.30 170.00/hr	221.00
	- JC	Attend status conference, hearing on plaintiffs' motions to compel regarding Special Interrogatories and Request for Production of Documents to Sankey defendants, and hearing regarding plaintiffs' counsel's requests to withdraw from case.	1.80 170.00/hr	306.00
	- JC	Meeting with M. Colen, counsel for Sankey Defendants, regarding development of litigation strategy for seeking transfer and consolidation of plaintiffs' new case, filed in District Court in Pennsylvania, to and with pending plaintiffs' case.	0.20 170.00/hr	34.00
	- JC	Meeting with insured, O. Taitz (as counsel for co-appellant Defend Our Freedoms Foundations), toward preparation for upcoming oral argument in consolidated appeals by insured and DOFF.	0.30 170.00/hr	51.00
1/15/2013	- JC	Begin review and analysis of plaintiffs' lengthy complaint (approximately 80 pages) in new and related case, Liberi v. Sankey, toward evaluation of claims and insured's potential liability regarding new case.	0.40 170.00/hr	68.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/16/2013	- JC	Continue review and analysis of plaintiffs' lengthy complaint (approximately 80 pages) in new and related case, Liberi v. Sankey, toward evaluation of claims and insured's potential liability regarding new case.	1.20 170.00/hr	204.00
1/18/2013	- JC	Continue review and analysis of plaintiffs' lengthy complaint (approximately 80 pages) in new and related case, Liberi v. Sankey, toward evaluation of claims and insured's potential liability regarding new case.	0.70 170.00/hr	119.00
	- JC	Review and analysis of court's order on plaintiffs' motions to compel regarding Special Interrogatories and Request for Production of Documents to Sankey Defendants.	0.30 170.00/hr	51.00
1/22/2013	- JC	Begin review and analysis of plaintiffs' report to court regarding sanctions against insured, O. Taitz, and related correspondence to court and counsel regarding sanctions, as required under subject court order.	0.50 170.00/hr	85.00
	- JC	Correspondence with insured, O. Taitz, regarding plaintiffs' report to court regarding sanctions against insured and related correspondence to court and counsel regarding sanctions, as required under subject court order.	0.20 170.00/hr	34.00
	- KS	Update to carrier regarding Berg's request for sanctions.	0.40 170.00/hr	68.00
	- JC	Begin review and analysis of multiple page response by insured, O. Taitz (as counsel for various parties in case), to plaintiffs' report to court regarding sanctions against insured and related correspondence to court and counsel regarding sanctions, as required under subject court order.	0.50 170.00/hr	85.00
1/23/2013	- JC	Review and analysis of court's 1/22/13 order regarding motions to compel regarding discovery by plaintiffs against Sankey defendants, motion by G. Krep to withdraw as plaintiffs' co-counsel, opposing counsel P. Berg's application regarding pro hac vice status, and order requiring further briefing by plaintiffs regarding legal representation.	0.40 170.00/hr	68.00
	- JC	Review and analysis of court's 1/23/13 order regarding Order to Show Cause against insured, O. Taitz, regarding alleged failure to report ethical violations and sanctions as required under previous court order.	0.40 170.00/hr	68.00
	- JC	Correspondence with insured, O. Taitz, regarding court's order to show cause against insured under previous order regarding reporting of sanctions.	0.20 170.00/hr	34.00
1/24/2013	- JC	Telephone conference with insured, O. Taitz, regarding court's order to show cause against insured under previous order regarding reporting of sanctions.	0.20 170.00/hr	34.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/24/2013	- KS	Conference regarding Court's order regarding insured's claimed lying.	0.40 170.00/hr	68.00
	- KS	Correspondence with client regarding response to Court order.	0.20 170.00/hr	34.00
1/25/2013	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
1/26/2013	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
1/28/2013	- JC	Begin legal analysis of file materials, legal arguments and subject case law on diversity jurisdiction issues regarding plaintiffs' (appellees') burden on jurisdictional issues, in opposition to insured's anti-SLAPP motion and in related appeals, toward preparation for upcoming oral argument.	0.90 170.00/hr	153.00
	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
1/29/2013	-	[REDACTED]		
		[REDACTED]		
		[REDACTED]		
	- KS	Conference with client regarding Order to Show Cause.	0.20 170.00/hr	34.00
	- JC	Continue legal analysis of file materials, legal arguments and subject case law on diversity jurisdiction issues regarding plaintiffs' (appellees') burden on jurisdictional issues, in opposition to insured's anti-SLAPP motion and in related appeals, toward preparation for upcoming oral argument.	1.30 170.00/hr	221.00
1/30/2013	- JC	Begin legal analysis of file materials, legal arguments and subject case law on issues regarding burden of insured, O. Taitz, and co-appellant, Defend Our Freedoms Foundation, on anti-SLAPP motion and in related appeals, toward preparation for upcoming oral argument.	1.10 170.00/hr	187.00
	- JC	Begin analysis of procedure regarding motion to request additional time for oral argument, in consolidated appeals by insured, O. Taitz and Defend Our Freedoms Foundation (represented by insured as counsel), toward preparation for upcoming oral argument in appeals.	0.40 170.00/hr	68.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
1/30/2013	- KS	Conference regarding appellate arguments.	0.40 170.00/hr	68.00
	- JC	Begin legal analysis of file materials, legal arguments and subject case law regarding issues regarding appellate jurisdiction, including appellees' claim of mootness of appeal, toward preparation for upcoming oral argument.	0.80 170.00/hr	136.00
1/31/2013	- JC	Continue legal analysis of file materials, legal arguments and subject case law regarding issues regarding appellate jurisdiction, including appellees' claim of mootness of appeal, toward preparation for upcoming oral argument.	1.10 170.00/hr	187.00
	- JC	Multiple correspondence with insured, O. Taitz (as counsel for co-appellant Defend Our Freedoms Foundation) regarding potential motion for additional time for oral arguments in consolidated appeals by DOFF and insured, toward preparation for upcoming oral argument in appeals.	0.30 170.00/hr	51.00
	- JC	Continue legal analysis of file materials, legal arguments and subject case law on issues regarding burden of insured, O. Taitz, and co-appellant, Defend Our Freedoms Foundation, on anti-SLAPP motion and in related appeals, toward preparation for upcoming oral argument.	0.90 170.00/hr	153.00
	- JC	Begin legal analysis of file materials, legal arguments and subject case law on issues regarding burden of plaintiffs (appellees) in opposition to insured's anti-SLAPP motion and in related appeals, toward preparation for upcoming oral argument.	0.90 170.00/hr	153.00
2/1/2013	- JC	Begin review and analysis of voluminous record on appeal (approximately 400 pages), toward preparation for upcoming oral argument.	0.80 170.00/hr	136.00
	-	<div style="background-color: black; height: 1.2em; width: 100%;"></div>		
2/2/2013	- JC	Begin legal analysis of file materials, legal arguments and subject case law on issues regarding burden of plaintiffs (appellees) on insured's anti-SLAPP motion and in related appeals regarding alleged diversity jurisdiction of federal court, toward preparation for upcoming oral argument.	1.20 170.00/hr	204.00
	- JC	Multiple telephone conferences with insured, O. Taitz (as counsel for co-appellant Defend Our Freedoms Foundation), regarding issues to be addressed at oral argument, in preparation for upcoming oral argument.	0.30 170.00/hr	51.00
	- JC	Continue legal analysis of file materials, legal arguments and subject case law regarding issues regarding appellate jurisdiction, including appellees' claim of mootness of appeal, toward preparation for upcoming oral argument.	0.80 170.00/hr	136.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
2/2/2013	- JC	Continue legal analysis of file materials, legal arguments and subject case law on diversity jurisdiction issues regarding plaintiffs' (appellees') burden on jurisdictional issues, in opposition to insured's anti-SLAPP motion and in related appeals, toward preparation for upcoming oral argument.	1.20 170.00/hr	204.00
	- JC	Continue legal analysis of file materials, legal arguments and subject case law on issues regarding burden of plaintiffs (appellees) in opposition to insured's anti-SLAPP motion and in related appeals, toward preparation for upcoming oral argument.	1.30 170.00/hr	221.00
2/3/2013	- JC	Continue legal analysis of file materials, legal arguments and subject case law regarding issues regarding appellate jurisdiction, including appellees' claim of mootness of appeal, toward preparation for upcoming oral argument.	0.80 170.00/hr	136.00
	- JC	Continue legal analysis of file materials, legal arguments and subject case law on issues regarding plaintiffs' (appellees') burden regarding insured's anti-SLAPP motion and in related appeals regarding alleged diversity jurisdiction of federal court, toward preparation for upcoming oral argument.	0.70 170.00/hr	119.00
	- JC	Continue review and analysis of voluminous record on appeal (approximately 400 pages), toward preparation for upcoming oral argument.	2.10 170.00/hr	357.00
	- JC	Multiple correspondence with opposing counsel for Sankey defendants, regarding status of their motion to transfer and consolidate plaintiffs' new, related case with pending case.	0.30 170.00/hr	51.00
2/4/2013	- JC	Attend lengthy meeting with insured, O. Taitz (as counsel for co-appellant Defend Our Freedoms Foundation), regarding issues to be addressed at oral argument, in preparation for upcoming oral argument.	1.30 170.00/hr	221.00
	- JC	Begin review and analysis of Sankey Defendants' 16 page motion to dismiss, or to consolidate with pending Liberi v. Taitz case, new and related case filed by Plaintiffs in Eastern District of Pennsylvania.	0.70 170.00/hr	119.00
	- JC	Continue legal analysis of file materials, legal arguments and subject case law on issues regarding burden of plaintiffs (appellees) in opposition to insured's anti-SLAPP motion and in related appeals, toward preparation for upcoming oral argument.	1.20 170.00/hr	204.00
	- JC	Continue legal analysis of file materials, legal arguments and subject case law regarding issues regarding appellate jurisdiction, including appellees' claim of mootness of appeal, toward preparation for upcoming oral argument.	0.40 170.00/hr	68.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/4/2013	- JC	Begin analysis of backgrounds of three appellate court justices assigned to hearing panel for oral argument in application, toward preparation for upcoming oral argument in appeal.	0.40 170.00/hr	68.00
	- JC	Begin review and analysis of court of appeals' 2/1/13 order regarding issues to be addressed at oral argument, in preparation for upcoming oral argument.	0.40 170.00/hr	68.00
2/5/2013	- JC	Begin review and analysis of plaintiffs' 10 page Memorandum of Points and Authorities and related exhibits and declarations, in response to court's Order to Show Cause regarding sanctions against insured, O. Taitz, for alleged violation of order requiring reporting of ethical violations.	0.80 170.00/hr	136.00
	- JC	Several telephone conferences with insured, O. Taitz (as counsel for co-appellant Defend Our Freedoms Foundation), regarding issues to be addressed at oral argument, in preparation for upcoming oral argument.	0.40 170.00/hr	68.00
	- JC	Continue review and analysis of Sankey Defendants' 16 page motion to dismiss, or to consolidate with pending Liberi v. Taitz case, new and related case filed by Plaintiffs in Eastern District of Pennsylvania.	0.50 170.00/hr	85.00
	- JC	Continue legal analysis of file materials, legal arguments and subject case law regarding issues regarding appellate jurisdiction, including appellees' claim of mootness of appeal, toward preparation for upcoming oral argument.	1.10 170.00/hr	187.00
2/6/2013	- JC	Begin review and analysis of insured's 9 page Memorandum of Points and Authorities and related exhibits and declarations, in response to court's Order to Show Cause regarding sanctions against insured for alleged violation of order requiring reporting of ethical violations.	0.70 170.00/hr	119.00
	- JC	Travel to and from court of appeals in Pasadena for oral argument in appeal by insured, O. Taitz, from denial of anti-SLAPP motion to strike.	3.30 170.00/hr	561.00
	- JC	Attend oral argument in appeal by insured, O. Taitz, and co-appellant, Defend Our Freedoms Foundation (represented by insured), from denial of anti-SLAPP motion to strike.	1.90 170.00/hr	323.00
	- JC	Meeting with insured, O. Taitz (as counsel for co-appellant, Defend Our Freedoms Foundation), regarding preparation for oral argument by insured and DOFF (represented by insured) from denial of anti-SLAPP motion to strike.	0.50 170.00/hr	85.00
	- JC	Meeting with insured, O. Taitz (as counsel for defendant, Defend Our Freedoms Foundation), and M. Colen (counsel for Sankey defendants), toward development of defense strategy for	0.60 170.00/hr	102.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
		motions to dismiss or transfer plaintiffs' related new case pending in Pennsylvania.		
2/7/2013	- JC	Begin review and analysis of plaintiffs' application to substitute R. Berg for G. Kreep as sponsoring attorney for pro hac vice admission of opposing counsel P. Berg, and related investigation into R. Berg.	0.40 170.00/hr	68.00
	- JC	Begin review and analysis of plaintiff's two requests to court for leave to file supplemental Memorandum of Points and Authorities, in support of court's Order to Show Cause regarding sanctions against insured, O. Taitz, for alleged violation of order requiring reporting of ethical violations.	0.50 170.00/hr	85.00
	- JC	Begin evaluation of legal issues regarding timeliness of potential new anti-SLAPP motion to strike by insured, O. Taitz, to first amended complaint in connection with resolution of pending appeal from denial of anti-SLAPP motion to complaint.	0.40 170.00/hr	68.00
2/9/2013	- KS	Correspondence with client regarding Court of Appeals.	0.30 170.00/hr	51.00
2/10/2013	- KS	Finalize response to client regarding appeal.	0.50 170.00/hr	85.00
	- JC	Multiple correspondence with insured, O. Taitz (as counsel for co-appellant Defend Our Freedoms Foundations), regarding issues in appeal on potential new anti-SLAPP motion to strike plaintiffs' amended complaint.	0.30 170.00/hr	51.00
2/15/2013	- KS	Conference with client regarding anti-SLAPP.	0.40 170.00/hr	68.00
	- JC	Multiple correspondence with insured, O. Taitz (as counsel for co-appellant, Defend Our Freedoms Foundations), regarding decision in appeal by insured and DOFF from denial of anti-SLAPP motion to strike.	0.30 170.00/hr	51.00
	- JC	Begin review and analysis of court's 2/14/13 order granting application of plaintiffs' co-counsel, G. Kreep, to withdraw as plaintiffs' counsel.	0.40 170.00/hr	68.00
	- JC	Begin review and analysis of court of appeals' decision in appeal by insured, O. Taitz, and co-appellant, Defend Our Freedoms Foundations (represented by insured), in appeal from denial of anti-SLAPP motion to strike.	0.50 170.00/hr	85.00
2/19/2013	- KS	Conference regarding new anti-SLAPP motion.	0.60 170.00/hr	102.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/20/2013	- JC	Multiple correspondence with insured, O. Taitz (as counsel for co-defendant Defend Our Freedoms Foundations), toward preparation of request for leave to file defendants' anti-SLAPP motion to strike to plaintiffs' first amended complaint.	0.30 170.00/hr	51.00
	- JC	Draft notice of filing court of appeals' decision in District Court.	0.30 170.00/hr	51.00
2/21/2013	- KS	Correspondence with carrier regarding ruling on appeal.	0.20 170.00/hr	34.00
	- JC	Begin drafting of insured's request for leave to District Court to file anti-SLAPP motion to strike to plaintiffs' first amended complaint.	0.70 170.00/hr	119.00
	- JC	Multiple correspondence with insured, as counsel for defendant Defend Our Freedoms Foundations, toward development of strategy seeking leave to file motions to strike and dismiss plaintiffs' first amended complaint.	0.30 170.00/hr	51.00
	- JC	Begin review and analysis of legal issues, and review and analysis of voluminous file materials including various orders and previous motions, toward preparation of insured's request for leave to District Court to file anti-SLAPP motion to strike to plaintiffs' first amended complaint.	1.20 170.00/hr	204.00
2/22/2013	- JC	Multiple telephone conferences with insured, O. Taitz (also as counsel for defendant, Defend Our Freedoms Foundations), toward development of insured's and DOFF's anti-SLAPP motion to strike plaintiffs' first amended complaint.	0.30 170.00/hr	51.00
	- JC	Begin review and analysis of appellees' cost bill to court of appeals, toward preparation of insured's objections to cost bill.	0.50 170.00/hr	85.00
2/25/2013	- KS	Correspondence with carrier regarding update on court's order and warnings.	0.30 170.00/hr	51.00
	- JC	Begin drafting of insured's Memorandum of Points and Authorities in opposition to appellees' cost bill to court of appeals, pursuant to carrier authority from Laurie Johnson.	0.80 170.00/hr	136.00
	- JC	Begin drafting of declaration, and organization of related exhibits, supporting insured's opposition to appellees' cost bill to court of appeals, pursuant to carrier authority from Laurie Johnson.	0.60 170.00/hr	102.00
	- JC	Begin drafting of declaration, and organization of supporting exhibits, supporting insured's cost bill to court of appeals, pursuant to carrier authority from Laurie Johnson.	0.60 170.00/hr	102.00
	- JC	Begin preparation of insured's cost bill to court of appeals, and related review and analysis of associated file materials, pursuant to carrier authority from Laurie Johnson.	0.90 170.00/hr	153.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/25/2013	- JC	Continue review and analysis of appellees' cost bill to court of appeals, and related file materials, toward preparation of insured's objections to cost bill.	0.70 170.00/hr	119.00
	- JC	Begin review and analysis of file materials, toward preparation of insured's cost bill in consolidated appeals.	0.70 170.00/hr	119.00
2/27/2013	- JC	Multiple correspondence with insured (as counsel for defendant, Defend Our Freedoms Foundations) and counsel for Sankey defendants, M. Colen, regarding order setting hearing on various motions to dismiss and to transfer by Sankey and Lexis Nexis defendants, in related Ostella v. Sankey case.	0.30 170.00/hr	51.00
2/28/2013	- JC	Review and analysis of order setting hearing on various motions to dismiss and to transfer by Sankey and Lexis Nexis defendants, in related Ostella v. Sankey case.	0.30 170.00/hr	51.00
3/4/2013	- JC	Begin review and analysis of various cases and other legal authorities cited by appellees in objections and Memorandum of Points and Authorities regarding insured's cost bill, toward preparation of insured's reply Memorandum of Points and Authorities to appellees' objections.	0.40 170.00/hr	68.00
	- JC	Begin review and analysis of appellees' reply Memorandum of Points and Authorities, declaration and exhibits regarding insured's opposition to appellees' cost bill.	0.50 170.00/hr	85.00
	- JC	Begin review and analysis of appellees' objections and Memorandum of Points and Authorities regarding insured's cost bill, and lengthy declaration with exhibits (over 80 pages), toward preparation of insured's reply Memorandum of Points and Authorities and declaration.	0.70 170.00/hr	119.00
	- JC	Multiple correspondence with insured, O. Taitz (as counsel for co-appellant, Defend Our Freedoms Foundations), regarding development of insured's and DOFF's reply to objections of plaintiffs' to insured's and DOFF's cost bills in appeal.	0.30 170.00/hr	51.00
3/5/2013	- JC	Continue review and analysis of appellees' objections and Memorandum of Points and Authorities regarding insured's cost bill, and lengthy declaration with exhibits (over 80 pages), toward preparation of insured's reply Memorandum of Points and Authorities and declaration.	0.70 170.00/hr	119.00
3/6/2013	- JC	Continue review and analysis of various cases and other legal authorities cited by appellees in objections and Memorandum of Points and Authorities regarding insured's cost bill, toward preparation of insured's reply Memorandum of Points and Authorities to appellees' objections.	0.50 170.00/hr	85.00
	- JC	Begin drafting insured's detailed Memorandum of Points and Authorities, and supporting declaration, in reply to appellees' objections and Memorandum of Points and Authorities regarding	1.80 170.00/hr	306.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
		insured's cost bill, pursuant to carrier authority from Laurie Johnson.		
3/7/2013	- JC	Begin drafting detailed declaration supporting reply Memorandum of Points and Authorities of insured, O. Taitz, regarding appellees' objections to insured's cost bill, pursuant to carrier authority from Laurie Johnson.	0.40 170.00/hr	68.00
	- JC	Continue drafting insured's detailed Memorandum of Points and Authorities, and supporting declaration, in reply to appellees' objections and Memorandum of Points and Authorities regarding insured's cost bill, pursuant to carrier authority from Laurie Johnson.	1.60 170.00/hr	272.00
	- JC	Multiple correspondence with insured, O. Taitz (as counsel for co-appellant, Defend Our Freedoms Foundations), toward preparation of reply to appellees' objections and Memorandum of Points and Authorities regarding insured's cost bill.	0.30 170.00/hr	51.00
3/8/2013	- MLC	Draft Certificate of Service for Taitz' Reply to Objections to Bill of Costs, on behalf of Jeffrey Cunningham., pursuant to carrier authority from Laurie Johnson.	0.10 95.00/hr	9.50
	- MLC	Review and revise Reply to Orly Taitz to Appellee's Objections to Taitz' Bill of Costs and Supporting Declaration with exhibit, pursuant to carrier authority from Laurie Johnson.	0.20 95.00/hr	19.00
	- JC	Continue drafting detailed declaration supporting reply Memorandum of Points and Authorities of insured, O. Taitz, regarding appellees' objections to insured's cost bill, pursuant to carrier authority from Laurie Johnson.	0.90 170.00/hr	153.00
	- JC	Multiple telephone conferences with insured, O. Taitz (as counsel for co-appellant, Defend Our Freedoms Foundations), toward preparation of reply to appellees' objections and Memorandum of Points and Authorities regarding insured's cost bill.	0.30 170.00/hr	51.00
3/11/2013	- JC	Multiple correspondence with insured (as co-counsel for several defendants) regarding status of disciplinary matter involving opposing counsel for plaintiffs', and potential suspension of opposing counsel.	0.30 170.00/hr	51.00
3/12/2013	- KS	Correspondence with carrier regarding expert fees for trial.	0.20 170.00/hr	34.00
	- KS	Conference regarding client's desire to file a petition with Court of Appeals.	0.20 170.00/hr	34.00
	- JC	Correspondence with insured (as co-counsel for several defendants) regarding Court of Appeals' decision in appeals by insured and Defend Our Freedoms Foundation (represented by	0.20 170.00/hr	34.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	insured), including potential petition for rehearing of appeals en banc.		
3/12/2013 - JC	Begin analysis of complex legal issues regarding potential petition for rehearing of appeals en banc by Ninth Circuit, as proposed by insured O. Taitz (as counsel for co-appellant Defend Our Freedoms Foundation).	0.70 170.00/hr	119.00
- JC	Review and analysis of Court of Appeals' decision on insured's and plaintiffs' cost bills in appeals, and remand to District Court.	0.40 170.00/hr	68.00
3/13/2013 - KS	Telephone call with carrier regarding future handling.	0.10 170.00/hr	17.00
- KS	Authority from Laurie Johnson regarding payment of cost bill.	0.10 170.00/hr	17.00
- JC	Correspondence with insured (as co-counsel for several defendants) regarding Court of Appeals' decision in appeals by insured and Defend Our Freedoms Foundation (represented by insured), including potential petition for rehearing of appeals en banc.	0.20 170.00/hr	34.00
- KS	Correspondence with carrier regarding cost bill, etc.	0.20 170.00/hr	34.00
- KS	Conference regarding client's request for a petition.	0.30 170.00/hr	51.00
- KS	Finalize correspondence to carrier regarding future handling.	0.20 170.00/hr	34.00
3/14/2013 - JC	Correspondence with opposing counsel regarding costs award in appeals.	0.20 170.00/hr	34.00
3/15/2013 - KS	Conference regarding new court order.	0.20 170.00/hr	34.00
3/16/2013 - KS	Conference regarding new court rulings.	0.40 170.00/hr	68.00
3/18/2013 - JC	Begin review and analysis of court's recent order on insured's request for leave to file anti-SLAPP motion to strike, plaintiffs' request for leave to file additional briefing regarding request for sanctions against insured, and plaintiffs' requests to file additional briefing regarding their motions to compel regarding Special Interrogatories and Request for Production of Documents to Sankey defendants.	0.50 170.00/hr	85.00
- JC	Begin analysis of legal issues regarding deadlines in federal court for filing California anti-SLAPP motion to strike, toward preparation of insured's motion to strike.	0.50 170.00/hr	85.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
3/19/2013	- JC	Continue analysis of legal issues regarding deadlines in federal court for filing California anti-SLAPP motion to strike, toward preparation of insured's motion to strike.	1.20 170.00/hr	204.00
	- JC	Begin review and analysis of plaintiffs' voluminous first amended complaint (approximately 200 pages), toward analysis of viability of potential FRCP Rule 12 motions to dismiss, and FRCP Rule 12 motion to strike.	1.90 170.00/hr	323.00
	- JC	Begin analysis of legal issues for carrier regarding viability of potential FRCP Rule 12 motions to dismiss, and FRCP Rule 12 motion to strike to plaintiffs' first amended complaint.	0.70 170.00/hr	119.00
	- JC	Lengthy correspondence to insured, O. Taitz (also as counsel for several defendants) regarding coordinated requests for leave to file FRCP motions to dismiss and strike plaintiffs' first amended complaint, and toward preparation of anti-SLAPP motion to strike amended complaint.	0.50 170.00/hr	85.00
3/21/2013	- KS	Correspondence with carrier regarding new anti-SLAPP.	0.20 170.00/hr	34.00
	- JC	Continue review and analysis of plaintiffs' voluminous first amended complaint (approximately 200 pages), toward analysis of viability of potential FRCP Rule 12 motions to dismiss, and FRCP Rule 12 motion to strike.	0.80 170.00/hr	136.00
	- JC	Correspondence with court clerk regarding clarification of court's March 15, 2013 order, toward preparation of insured's anti-SLAPP motion to strike plaintiffs' first amended complaint.	0.20 170.00/hr	34.00
	- JC	Correspondence with insured, O. Taitz (also as counsel for several defendants) regarding coordinated requests for leave to file FRCP motions to dismiss and strike plaintiffs' first amended complaint, and toward preparation of anti-SLAPP motion to strike amended complaint.	0.20 170.00/hr	34.00
	- KS	Amend analysis for client.	0.40 170.00/hr	68.00
3/22/2013	- JC	Multiple correspondence with court clerk and all opposing counsel, regarding insured's request for clarification of court's requirements for insured's anti-SLAPP motion to strike.	0.30 170.00/hr	51.00
	- JC	Begin drafting detailed request to court for leave to file FRCP motions to dismiss plaintiffs' first amended complaint (two motions), plus FRCP motion to strike, pursuant to carrier authority from Laurie Johnson.	0.40 170.00/hr	68.00
	- JC	Begin review of voluminous court records and docket regarding previous law and motion activity by insured, O. Taitz, toward drafting detailed request to court for leave by insured to file	2.10 170.00/hr	357.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
	FRCP motions to dismiss plaintiffs' first amended complaint (two motions), plus FRCP motion to strike (total of three motions).		
3/22/2013 - JC	Draft detailed correspondence and legal analysis to insured, O. Taitz (also as counsel for several defendants) regarding summary of previous law and motion activity by insured and related parties, toward drafting detailed request to court for leave by insured to file FRCP motions to dismiss plaintiffs' first amended complaint (two motions), plus FRCP motion to strike (total of three motions).	0.60 170.00/hr	102.00
- KS	Conference with carrier regarding future handling.	0.20 170.00/hr	34.00
- JC	Review and analysis of plaintiff's sur-reply Memorandum of Points and Authorities seeking imposition of sanctions against insured, O. Taitz, regarding court's Order to Show Cause regarding sanctions against insured.	0.50 170.00/hr	85.00
3/23/2013 - JC	Begin review and analysis of legal issues raised in plaintiff's sur-reply Memorandum of Points and Authorities seeking imposition of sanctions against insured, O. Taitz, regarding court's Order to Show Cause regarding sanctions against insured.	0.40 170.00/hr	68.00
3/24/2013 - KS	Telephone call with client regarding Order to Show Cause.	0.20 170.00/hr	34.00
3/25/2013 - JC	Multiple correspondence with insured, O. Taitz, regarding court's Order to Show Cause regarding sanctions against her regarding reporting of sanctions imposed against insured in other cases.	0.30 170.00/hr	51.00
- JC	Correspondence with adjuster Laurie Johnson regarding payment of costs on appeal.	0.20 170.00/hr	34.00
- KS	Conference regarding anti-SLAPP and sanctions request.	0.30 170.00/hr	51.00
- JC	Multiple correspondence with opposing counsel regarding payment of costs on appeal.	0.30 170.00/hr	51.00
3/26/2013 - KS	Telephone call from client regarding law and motion.	0.20 170.00/hr	34.00
- KS	Conference regarding attack on pleadings.	0.80 170.00/hr	136.00
- JC	Multiple correspondence with insured (as co-defense counsel) regarding evaluation of legal issues regarding seeking leave to file FRCP Rule 12 b 1 motion to dismiss for lack of diversity jurisdiction.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/26/2013 -	KS	Correspondence with client regarding future handling.	0.40 170.00/hr	68.00
3/27/2013 -	KS	Conference regarding client's requests for new attacks on plaintiffs' complaint.	0.60 170.00/hr	102.00
-	JC	Multiple telephone conferences with insured (as co-defense counsel) regarding evaluation of legal issues regarding seeking leave to file FRCP Rule 12 b 1 motion to dismiss for lack of diversity jurisdiction.	0.30 170.00/hr	51.00
-	JC	Begin drafting of insured's request to court for leave to file FRCP Rule 12(b)(1) motion to dismiss for lack of diversity jurisdiction, and related review and analysis of voluminous file materials including plaintiffs' 170 page amended complaint plus approximately 800 pages of exhibits necessary to support request, pursuant to carrier authority from Laurie Johnson.	1.50 170.00/hr	255.00
-				
-	JC	Begin drafting of insured's request to court for leave to file FRCP Rule 12(b)(6) motion to dismiss for lack of diversity jurisdiction, and related review and analysis of voluminous file materials including plaintiffs' 170 page amended complaint plus approximately 800 pages of exhibits necessary to support request, pursuant to carrier authority from Laurie Johnson.	1.40 170.00/hr	238.00
-	JC	Begin drafting of insured's request to court for leave to file FRCP Rule 12(f) motion to strike, and related review and analysis of voluminous file materials including plaintiffs' 170 page amended complaint plus approximately 800 pages of exhibits necessary to support request, pursuant to carrier authority from Laurie Johnson.	0.90 170.00/hr	153.00
3/28/2013 -	KS	Analyze client's request further.	0.60 170.00/hr	102.00
-	JC	Continue drafting of insured's request to court for leave to file FRCP Rule 12(f) motion to strike, and related review and analysis of voluminous file materials including plaintiffs' 170 page amended complaint plus approximately 800 pages of exhibits necessary to support request, pursuant to carrier authority from Laurie Johnson.	1.30 170.00/hr	221.00
-	JC	Begin drafting lengthy and detailed meet and confer demand, as required under local court rules, to opposing counsel regarding insured's anti-SLAPP motion to strike, including review and analysis of voluminous file materials including plaintiffs' 170 page amended complaint with 800 pages of exhibits.	1.90 170.00/hr	323.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/28/2013	- JC	Several correspondence with insured (including in capacity as co-defense counsel) regarding proposed discovery and investigation regarding diversity jurisdiction issues and related evaluation of legal issues regarding seeking leave to file FRCP Rule 12(h) motion to dismiss for lack of diversity jurisdiction.	0.50 170.00/hr	85.00
	- KS	Conference regarding response to client's request for further law and motion.	0.30 170.00/hr	51.00
3/29/2013	- JC	Begin review and analysis of request by insured, O. Taitz (as co-defense counsel), for leave to file FRCP Rule 12(b)(1) motion to dismiss.	0.40 170.00/hr	68.00
	- JC	Begin evaluation of plaintiffs' alleged privacy rights under California and federal law, and related claims, toward support for insured's meet and confer demand, as required under local court rules, to opposing counsel regarding insured's anti-SLAPP motion to strike.	2.90 170.00/hr	493.00
	- JC	Continue drafting request to court for leave to file FRCP Rule 12(b)(6) and (f) motions to dismiss and strike first amended complaint, pursuant to carrier authority from Laurie Johnson.	0.40 170.00/hr	68.00
	- JC	Continue drafting lengthy and detailed meet and confer demand (approximately 20 pages), as required under local court rules, to opposing counsel regarding insured's anti-SLAPP motion to strike, including review and analysis of voluminous file materials including plaintiffs' 170 page amended complaint with 800 pages of exhibits.	2.40 170.00/hr	408.00
3/31/2013	- JC	Review and analysis of response Memorandum of Points and Authorities and declaration by insured, O. Taitz (as co-defense counsel), to plaintiffs' reply Memorandum of Points and Authorities regarding Order to Show Cause regarding sanctions against insured.	0.60 170.00/hr	102.00
4/1/2013	- KS	Conference regarding court orders.	0.30 170.00/hr	51.00
	- JC	Continue drafting lengthy and detailed meet and confer demand (approximately 20 pages), as required under local court rules, to opposing counsel regarding insured's anti-SLAPP motion to strike, including review and analysis of voluminous file materials including plaintiffs' 170 page amended complaint with 800 pages of exhibits.	1.30 170.00/hr	221.00
	- JC	Review and analysis of summary of opposition Memorandum of Points and Authorities by defendants, T. Sankey and Sankey Firm, in opposition to plaintiffs' motion to compel regarding Request for Production of Documents to Sankey defendants.	0.60 170.00/hr	102.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/1/2013	- JC	Review and analysis of court of appeals' 4/1/13 order reducing award of costs to appellees in appeal.	0.40 170.00/hr	68.00
	- JC	Correspondence with adjuster Laurie Johnson regarding court of appeals' order reducing appellees' costs on appeal.	0.20 170.00/hr	34.00
	- JC	Begin drafting insured's detailed anti-SLAPP motion to strike first amended complaint, pursuant to authorization of adjuster Laurie Johnson.	0.70 170.00/hr	119.00
	- JC	Review and analysis of plaintiffs' supplemental Memorandum of Points and Authorities regarding motion to compel defendants, T. Sankey and Sankey Firm, regarding Special Interrogatories to Sankey defendants.	0.70 170.00/hr	119.00
4/2/2013	- JC	Begin review and analysis of voluminous file materials regarding motions for summary judgment of Lexis and Intelius Defendants including orders and findings, toward support for insured's anti-SLAPP motion to strike first amended complaint and supporting request for judicial notice.	0.90 170.00/hr	153.00
	- JC	Review and analysis of plaintiffs' supplemental Memorandum of Points and Authorities regarding motion to compel defendants, T. Sankey and Sankey Firm, regarding Request for Production of Documents to Sankey defendants.	0.60 170.00/hr	102.00
4/3/2013	- JC	Begin review and organize of voluminous file materials including court file documents, toward support for insured's anti-SLAPP motion to strike first amended complaint and supporting request for judicial notice.	0.70 170.00/hr	119.00
4/4/2013	- JC	Receipt and review of notice of filing court of appeals' order in district court on insured's and appellees' motions to tax costs on appeal.	0.30 170.00/hr	51.00
	- JC	Continue review and analysis of voluminous file materials regarding motions for summary judgment of Lexis and Intelius Defendants including orders and findings, toward support for insured's anti-SLAPP motion to strike first amended complaint and supporting request for judicial notice.	1.10 170.00/hr	187.00
4/5/2013	- JC	Continue review and analysis of lengthy complaint (approximately 70 pages) in related case, Liberi v. IRB Research.	1.20 170.00/hr	204.00
	- JC	Begin development of insured's complex legal arguments regarding application of California discharge of official duty privilege defense, including review and analysis of plaintiffs' 170 page amended complaint for examples of protected publications, toward support for insured's anti-SLAPP motion to strike amended complaint.	1.30 170.00/hr	221.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/8/2013	- KS	Telephone call from client regarding meet and confer.	0.20 170.00/hr	34.00
	- JC	Continue development of insured's complex legal arguments regarding application of California discharge of official duty privilege defense, including review and analysis of plaintiffs' 170 page amended complaint for examples of protected publications, toward support for insured's anti-SLAPP motion to strike amended complaint.	1.70 170.00/hr	289.00
	- JC	Multiple telephone conference with insured, O. Taitz (also as co-defense counsel) toward development of meet and confer arguments regarding insured's proposed anti-SLAPP motion to strike.	0.30 170.00/hr	51.00
	- JC	Continue preparation of lengthy meet and confer correspondence to opposing counsel regarding insured's proposed anti-SLAPP motion to strike.	1.60 170.00/hr	272.00
	- JC	Begin review and analysis of issue of potential treatment of insured's anti-SLAPP motion to strike as motion for summary judgment, and potential consequences of such treatment, toward preparation of anti-SLAPP motion.	1.10 170.00/hr	187.00
	- JC	Continue preparation of insured's lengthy and detailed anti-SLAPP motion to strike to plaintiffs' first amended complaint, pursuant to carrier authority from Laurie Johnson.	1.80 170.00/hr	306.00
	- JC	Continue evaluation and development of insured's complex legal arguments regarding non-California residents lack of privacy rights under California Constitution, toward support for insured's anti-SLAPP motion to strike amended complaint.	0.90 170.00/hr	153.00
4/9/2013	- JC	Draft correspondence to adjuster Laurie Johnson regarding order in appeals reducing cost award to appellees, and regarding payment of reduced award.	0.30 170.00/hr	51.00
	- KS	Telephone call from client regarding anti-SLAPP Motion.	0.20 170.00/hr	34.00
	- JC	Correspondence with insured, O. Taitz (also as co-defense counsel) regarding insured's requested revisions to lengthy meet and confer statement regarding insured's proposed anti-SLAPP motion to strike to amended complaint.	0.20 170.00/hr	34.00
4/10/2013	- JC	Continue development of insured's complex legal arguments regarding application of California litigation privilege defense, including review and analysis of plaintiffs' 170 page amended complaint for examples of protected publications, toward support for insured's anti-SLAPP motion to strike amended complaint.	1.40 170.00/hr	238.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/10/2013 -	JC	Several telephone conferences with insured, O. Taitz (also as co-defense counsel) regarding insured's requested revisions to lengthy meet and confer statement regarding insured's proposed anti-SLAPP motion to strike to amended complaint.	0.50 170.00/hr 85.00
-	JC	Begin review and analysis of numerous suggested revisions by insured, O. Taitz (also as co-defense counsel) to lengthy meet and confer statement regarding insured's proposed anti-SLAPP motion to strike to amended complaint.	0.60 170.00/hr 102.00
-	JC	Continue evaluation and development of insured's complex legal arguments regarding non-California residents lack of privacy rights under California Constitution, toward support for insured's anti-SLAPP motion to strike amended complaint, pursuant to authority of adjuster Laurie Johnson.	0.70 170.00/hr 119.00
-	JC	Correspondence with opposing counsel regarding insured's proposed anti-SLAPP motion to strike.	0.20 170.00/hr 34.00
-	JC	Begin drafting several revisions requested by insured, O. Taitz (also as co-defense counsel) to detailed meet and confer demand, as required under local court rules, to opposing counsel regarding insured's anti-SLAPP motion to strike.	1.30 170.00/hr 221.00
-	KS	Conference regarding client's other cases and relation to opposing counsel's allegations.	0.30 170.00/hr 51.00
-	JC	Continue review and analysis of lengthy complaint (approximately 70 pages) in related case, Liberi v. IRB Research.	0.60 170.00/hr 102.00
-	JC	Begin drafting portion of insured's detailed anti-SLAPP motion to strike first amended complaint regarding application of California official duty and litigation privilege defenses, pursuant to authorization of adjuster Laurie Johnson.	0.90 170.00/hr 153.00
4/11/2013 -	JC	Review and analysis numerous reports on Pennsylvania Supreme Court website, regarding pending disciplinary proceeding against opposing counsel, and toward potential motion to remove as opposing counsel.	0.50 170.00/hr 85.00
-	JC	Continue development of insured's complex legal arguments regarding application of California litigation privilege defense, including review and analysis of plaintiffs' 170 page amended complaint for examples of protected publications, toward support for insured's anti-SLAPP motion to strike amended complaint.	1.30 170.00/hr 221.00
-	JC	Begin review and analysis of file materials including orders and findings regarding defendant, Oracle Corporation's motion to dismiss, toward development of insured's legal arguments based on claim preclusion in support of insured's anti-SLAPP motion to strike.	0.60 170.00/hr 102.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
4/12/2013 -	JC	Continue development of insured's complex legal arguments regarding application of California discharge of official duty privilege defense, including review and analysis of plaintiffs' 170 page amended complaint for examples of protected publications, toward support for insured's anti-SLAPP motion to strike amended complaint.	0.60 170.00/hr 102.00
-	JC	Continue drafting portion of insured's detailed anti-SLAPP motion to strike first amended complaint regarding application of California official duty and litigation privilege defenses, pursuant to authorization of adjuster Laurie Johnson.	0.80 170.00/hr 136.00
4/15/2013 -	JC	Continue drafting portion of insured's detailed anti-SLAPP motion to strike first amended complaint regarding application of California litigation privilege defense, pursuant to authorization of adjuster Laurie Johnson.	1.80 170.00/hr 306.00
-	JC	Continue review and analysis of file materials including orders and findings regarding defendant, Oracle Corporation's motion to dismiss, toward development of insured's legal arguments based on claim preclusion in support of insured's anti-SLAPP motion to strike.	1.70 170.00/hr 289.00
-	JC	Multiple telephone conferences with adjuster Laurie Johnson regarding status of insured's anti-SLAPP motion to strike.	0.30 170.00/hr 51.00
4/16/2013 -	JC	Begin review and analysis of file materials including orders and findings regarding defendant, Lexis Nexis's motion for summary judgment, toward development of insured's legal arguments based on claim preclusion in support of insured's anti-SLAPP motion to strike.	0.90 170.00/hr 153.00
-	JC	Begin review and analysis of opposing counsel's lengthy (greater than 40 pages) meet and confer correspondence regarding anti-SLAPP motion to strike by insured, O. Taitz, toward preparation for required conference with opposing counsel regarding motion.	1.10 170.00/hr 187.00
-	JC	Begin evaluation of plaintiffs' new arguments regarding privacy rights under Pennsylvania, New Jersey and New Mexico law, and review and analysis of related legal authorities cited, toward preparation of insured's anti-SLAPP motion and preparation for meet and confer conference with opposing counsel regarding motion.	1.20 170.00/hr 204.00
-	JC	Several telephonic conferences with insured, O. Taitz (also as co-defense counsel) regarding analysis of opposing counsel's lengthy (greater than 40 pages) meet and confer correspondence regarding anti-SLAPP motion to strike by insured, toward preparation for required conference with opposing counsel regarding motion.	0.40 170.00/hr 68.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
4/16/2013	- KS	Conference regarding client's response to meet and confer.	0.20 170.00/hr	34.00
4/17/2013	- KS	Conference regarding client's response.	0.20 170.00/hr	34.00
	- KS	Correspondence with opposing counsel regarding meet and confer.	0.60 170.00/hr	102.00
	- JC	Continue review and analysis of opposing counsel's lengthy (greater than 40 pages) meet and confer correspondence regarding anti-SLAPP motion to strike by insured, O. Taitz, toward preparation for required conference with opposing counsel regarding motion.	1.20 170.00/hr	204.00
	- JC	Begin review and analysis of numerous cases and other legal authorities cited by opposing counsel in lengthy (greater than 40 pages) meet and confer correspondence regarding anti-SLAPP motion to strike by insured, O. Taitz, toward preparation for required conference with opposing counsel regarding motion.	1.90 170.00/hr	323.00
4/18/2013	- JC	Continue review and analysis of opposing counsel's lengthy (greater than 40 pages) meet and confer correspondence regarding anti-SLAPP motion to strike by insured, O. Taitz, toward preparation for required conference with opposing counsel regarding motion.	1.90 170.00/hr	323.00
	- JC	Begin evaluation of plaintiffs' choice of law arguments, and review and analysis of related legal authorities cited, toward preparation of insured's anti-SLAPP motion and preparation for meet and confer conference with opposing counsel regarding motion.	0.80 170.00/hr	136.00
	- JC	Begin evaluation of plaintiffs' California Information Practices Act arguments, and review and analysis of related legal authorities cited, toward preparation of insured's anti-SLAPP motion and preparation for meet and confer conference with opposing counsel regarding motion.	0.80 170.00/hr	136.00
	- JC	Continue evaluation and development of complex legal arguments regarding litigation privilege defenses, toward support for insured's anti-SLAPP motion to strike to amended complaint.	0.70 170.00/hr	119.00
	- JC	Begin drafting of request for judicial notice supporting anti-SLAPP motion to strike, pursuant to authority of adjuster Laurie Johnson.	0.50 170.00/hr	85.00
	- JC	Multiple correspondence with insured, O. Taitz (also as co-defense counsel) regarding seeking court decision on pending requests for leave to file motions to dismiss and strike.	0.30 170.00/hr	51.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
4/19/2013	- JC	Continue evaluation of plaintiffs' choice of law arguments, and review and analysis of related legal authorities cited, toward preparation of insured's anti-SLAPP motion and preparation for meet and confer conference with opposing counsel regarding motion.	0.70 170.00/hr	119.00
	- JC	Begin review and analysis of numerous court filings, including 100 page transcript of hearing on plaintiffs' motion for injunction, toward support for insured's anti-SLAPP motion to strike on no diversity jurisdiction grounds and related request for judicial notice.	0.90 170.00/hr	153.00
	- JC	Correspondence with opposing counsel regarding meet and confer conference regarding insured's proposed anti-SLAPP motion to strike.	0.20 170.00/hr	34.00
	- JC	Begin drafting portion of insured's detailed anti-SLAPP motion to strike first amended complaint regarding Plaintiffs' California Information Practices Claims, pursuant to authorization of adjuster Laurie Johnson.	1.30 170.00/hr	221.00
4/22/2013	- JC	Continue drafting portion of insured's detailed anti-SLAPP motion to strike first amended complaint regarding Plaintiffs' California Information Practices Claims, pursuant to authorization of adjuster Laurie Johnson.	1.70 170.00/hr	289.00
	- JC	Begin drafting portion of insured's detailed anti-SLAPP motion to strike first amended complaint regarding Plaintiffs' cyber-stalking and harassment claims, pursuant to authorization of adjuster Laurie Johnson.	0.90 170.00/hr	153.00
	- PB	Revise Anti-SLAPP motion and accompanying Request for Judicial Notice, pursuant to carrier authority from Laurie Johnson.	0.60 95.00/hr	57.00
	- JC	Multiple correspondence with opposing counsel for Sankey Defendants regarding status of their motion to dismiss related Pennsylvania case.	0.30 170.00/hr	51.00
	- JC	Begin review and analysis of California single publication rule regarding defamation, as potential limitation on plaintiffs' defamation damages, and toward potential use in support of anti-SLAPP motion to strike.	0.90 170.00/hr	153.00
4/23/2013	- JC	Multiple correspondence with counsel for Sankey defendants regarding hearing on their motion to dismiss in related case, Liberi v. IRB.	0.30 170.00/hr	51.00
	- JC	Continue drafting portion of insured's detailed anti-SLAPP motion to strike first amended complaint regarding Plaintiffs' cyber-stalking and harassment claims, pursuant to authorization of adjuster Laurie Johnson.	0.80 170.00/hr	136.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/23/2013	- JC	Begin drafting of portions of insured's anti-SLAPP motion to strike regarding public disclosure of private facts claims, pursuant to authorization of adjuster Laurie Johnson.	0.70 170.00/hr	119.00
	- JC	Continue review and analysis of numerous court filings, including 100 page transcript of hearing on plaintiffs' motion for injunction, toward support for insured's anti-SLAPP motion to strike on no diversity jurisdiction grounds and related request for judicial notice.	1.20 170.00/hr	204.00
	- JC	Begin drafting of portions of insured's anti-SLAPP motion to strike regarding claim preclusion against plaintiff, L. Liberi, based on Lexis Nexis summary judgment, pursuant to authorization of adjuster Laurie Johnson.	1.30 170.00/hr	221.00
	- JC	Begin drafting of portions of insured's anti-SLAPP motion to strike regarding malicious prosecution claim and insured's defenses, pursuant to authorization of adjuster Laurie Johnson.	0.80 170.00/hr	136.00
4/24/2013	- JC	Continue drafting of portions of insured's anti-SLAPP motion to strike regarding claim preclusion against plaintiff, L. Liberi, based on Lexis Nexis summary judgment, pursuant to authorization of adjuster Laurie Johnson.	0.90 170.00/hr	153.00
	- JC	Begin drafting of portions of insured's anti-SLAPP motion to strike regarding Information Practices Act claims and insured's defenses, pursuant to authorization of adjuster Laurie Johnson.	0.70 170.00/hr	119.00
	- JC	Begin drafting of portions of insured's anti-SLAPP motion to strike regarding lack of diversity jurisdiction, pursuant to authorization of adjuster Laurie Johnson.	1.50 170.00/hr	255.00
	- JC	Begin drafting of portions of insured's anti-SLAPP motion to strike regarding entity plaintiffs' lack of standing on several causes of action, pursuant to authorization of adjuster Laurie Johnson.	1.10 170.00/hr	187.00
	- JC	Begin drafting of portions of insured's anti-SLAPP motion to strike regarding alleged defamatory statements of opinion, and insured's related defenses, pursuant to authorization of adjuster Laurie Johnson.	1.00 170.00/hr	170.00
4/25/2013	- JC	Continue drafting of portions of insured's anti-SLAPP motion to strike regarding Information Practices Act claims and insured's defenses, pursuant to authorization of adjuster Laurie Johnson.	1.10 170.00/hr	187.00
4/26/2013	- JC	Continue drafting of portions of insured's anti-SLAPP motion to strike regarding lack of diversity jurisdiction, regarding plaintiff L. Liberi, pursuant to authorization of adjuster Laurie Johnson.	2.60 170.00/hr	442.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/26/2013	- JC	Several telephone conferences with insured, O. Taitz (also as co-counsel for several defendants) regarding development of insured's anti-SLAPP motion to strike.	0.50 170.00/hr	85.00
	- JC	Continue drafting of portions of insured's anti-SLAPP motion to strike regarding malicious prosecution claim and insured's defenses, pursuant to authorization of adjuster Laurie Johnson.	0.80 170.00/hr	136.00
	- JC	Continue drafting request for judicial notice supporting insured's anti-SLAPP motion to strike amended complaint, pursuant to carrier authority from Laurie Johnson.	1.40 170.00/hr	238.00
4/29/2013	- JC	Multiple correspondence with opposing counsel for Sankey defendants regarding status of disciplinary action against plaintiffs' counsel, P. Berg.	0.30 170.00/hr	51.00
	- JC	Multiple correspondence with plaintiffs' opposing counsel regarding payment of costs awarded in appeal.	0.30 170.00/hr	51.00
	- JC	Multiple correspondence with insured (as co-counsel for several defendants) regarding revisions to anti-SLAPP motion to strike.	0.30 170.00/hr	51.00
	- JC	Begin drafting of portions of insured's anti-SLAPP motion to strike regarding lack of federal question jurisdiction, pursuant to authorization of adjuster Laurie Johnson.	0.70 170.00/hr	119.00
	- JC	Begin drafting of portions of insured's anti-SLAPP motion to strike regarding public interest factors, following conference with insured (also as co-counsel for several defendants) and adding insured's suggested revisions, pursuant to authorization of adjuster Laurie Johnson.	1.40 170.00/hr	238.00
5/1/2013	- JC	Continue drafting of portions of insured's anti-SLAPP motion to strike regarding lack of federal question jurisdiction, pursuant to authorization of adjuster Laurie Johnson.	1.10 170.00/hr	187.00
	- JC	Begin drafting portions of insured's anti-SLAPP motion to strike regarding lack of supplemental and pendant jurisdiction, pursuant to authorization of adjuster Laurie Johnson.	1.30 170.00/hr	221.00
	- JC	Continue drafting comprehensive update for carrier regarding evaluation of status of case, discovery, significant law and motion matters, appeals, related cases and future handling issues.	1.40 170.00/hr	238.00
5/2/2013	- JC	Continue drafting portions of insured's anti-SLAPP motion to strike regarding lack of supplemental and pendant jurisdiction, pursuant to authorization of adjuster Laurie Johnson.	0.90 170.00/hr	153.00
	- JC	Begin review and analysis of legal issues regarding potential reciprocal right to attorney fees and litigation costs under California appropriation invasion of privacy statute.	0.90 170.00/hr	153.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/2/2013	- JC	Begin analysis of legal issues, and insured's related defenses, regarding plaintiffs' claims under Civil Code customer records sections, including for substantial (greater than \$10 million) in penalties.	1.30 170.00/hr	221.00
	- JC	Continue drafting comprehensive update for carrier regarding evaluation of status of case, discovery, significant law and motion matters, appeals, related cases and future handling issues.	1.10 170.00/hr	187.00
5/3/2013	- JC	Several correspondence with insured (as counsel for several defendants) regarding proposed revisions to anti-SLAPP motion as to public interest factors.	0.50 170.00/hr	85.00
	- JC	Begin drafting insured's anti-SLAPP motion to strike, with new revisions by insured O. Taitz (also as counsel for several co-defendants) regarding public interest factors under anti-SLAPP statute, pursuant to authorization of adjuster Laurie Johnson.	0.90 170.00/hr	153.00
	- JC	Begin evaluation and development of insured's potential legal arguments and defenses based on Communications Decency Act, toward support of insured's anti-SLAPP motion to strike.	2.10 170.00/hr	357.00
5/5/2013	- JC	Begin drafting of portions of insured's anti-SLAPP motion to strike based on complex Communications Decency Act legal arguments, pursuant to authorization of adjuster Laurie Johnson.	1.70 170.00/hr	289.00
5/6/2013	- JC	Begin review and analysis of criminal and bankruptcy matters regarding plaintiff, L. Liberi, toward support for insured's motion to strike regarding first amended complaint.	0.90 170.00/hr	153.00
	- JC	Continue drafting of portions of insured's anti-SLAPP motion to strike based on complex Communications Decency Act legal arguments, pursuant to authorization of adjuster Laurie Johnson..	2.40 170.00/hr	408.00
	- JC	Multiple correspondence with insured, O. Taitz (also as counsel for co-defendants) regarding development of insured's Communications Decency Act arguments in anti-SLAPP motion to strike.	0.30 170.00/hr	51.00
5/7/2013	- KS	Conference regarding future handling and client's demands regarding SLAPP motion.	0.60 170.00/hr	102.00
	- JC	Multiple telephone conferences with insured, O. Taitz (also as counsel for co-defendants) regarding revisions to lack of federal question and supplemental jurisdiction arguments in insured's anti-SLAPP motion to strike.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/8/2013	- JC	Begin drafting portions of anti-SLAPP motion to strike regarding public interest factors incorporating revisions of insured, O. Taitz (also as counsel for co-defendants), pursuant to authorization of adjuster Laurie Johnson.	1.20 170.00/hr	204.00
	- JC	Multiple telephone conferences with insured, O. Taitz (also as counsel for co-defendants) regarding insured's revisions to anti-SLAPP motion to strike on public interest issues and Communications Decency Act defenses.	0.30 170.00/hr	51.00
	- JC	Begin drafting portions of anti-SLAPP motion to strike regarding Communications Decency Act incorporating revisions of insured, O. Taitz (also as counsel for co-defendants), pursuant to authorization of adjuster Laurie Johnson.	0.70 170.00/hr	119.00
5/9/2013	- JC	Multiple telephone conferences with insured, O. Taitz (also as counsel for co-defendants) regarding insured's proposals for revisions to anti-SLAPP motion to strike on lack of federal question and supplemental jurisdiction issues and insured's related defenses.	0.30 170.00/hr	51.00
	- JC	Continue drafting portions of anti-SLAPP motion of insured, O. Taitz (also as counsel for co-defendants), revising and incorporating insured's proposed additions to motion regarding lack of federal question and supplemental jurisdiction and on public interest facts under anti-SLAPP statute, pursuant to authorization of adjuster Laurie Johnson.	1.90 170.00/hr	323.00
	- JC	Begin evaluation of proposed additions by insured, O. Taitz (also as counsel for co-defendants), to insured's anti-SLAPP motion to strike regarding lack of federal question and supplemental jurisdiction issues and insured's related defenses, including review and analysis of statutes and case law cited for proposed additions.	1.80 170.00/hr	306.00
5/10/2013	- MLC	Draft and finalize Table of Contents and Table of Authorities for Anti-SLAPP Motion by Orly Taitz to First Amended Complaint	1.60 95.00/hr	152.00
5/14/2013	- JC	Continue drafting comprehensive update and analysis for carrier regarding insured's anti-SLAPP motion, effect of motion, related attorneys' fees claims and potential appeals from order on motion.	0.80 170.00/hr	136.00
	- JC	Continue drafting comprehensive update and analysis for carrier regarding plaintiffs' injunctive relief and penalty claims, alleged substantial damages, opposing counsel's pending disciplinary action, and associated future handling plan.	0.50 170.00/hr	85.00
	- JC	Continue drafting comprehensive update and analysis for carrier regarding plaintiffs' Information Practices Act and related claims, and substantial damages sought, and future handling plan regarding such claims.	0.60 170.00/hr	102.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/14/2013	- JC	Continue drafting comprehensive update and analysis for carrier regarding plaintiffs' malicious prosecution and abuse of process claims, and future handling plan regarding claims.	0.70 170.00/hr	119.00
5/20/2013	- KS	Finalize update to carrier regarding status and future handling.	0.50 170.00/hr	85.00
5/24/2013	- KS	Conference regarding possible malicious prosecution claim.	0.30 170.00/hr	51.00
5/27/2013	- JC	Begin attorney analysis of insureds' potential abuse of process and malicious prosecution claims vs. plaintiffs, toward preparation of potential counter-claim.	0.40 170.00/hr	68.00
5/29/2013	- KS	Conference with client regarding future handling.	0.40 170.00/hr	68.00
	- JC	Multiple correspondence with insured, O. Taitz, regarding plaintiffs' failure to timely file opposition to insured's anti-SLAPP motion to strike.	0.30 170.00/hr	51.00
	- KS	Conference regarding client's demand for new pleadings.	0.30 170.00/hr	51.00
5/30/2013	- JC	Preparation of notice of non-opposition to anti-SLAPP motion to strike of insured, O. Taitz, pursuant to authorization of adjuster Laurie Johnson.	0.40 170.00/hr	68.00
	- JC	Continue attorney analysis of insureds' potential abuse of process and malicious prosecution claims vs. plaintiffs, toward preparation of potential counter-claim.	0.50 170.00/hr	85.00
	- JC	Begin drafting detailed correspondence to insureds regarding potential abuse of process and malicious prosecution claims vs. plaintiffs.	0.40 170.00/hr	68.00
	- JC	Multiple correspondence with opposing counsel for Sankey defendants, regarding status of motions to dismiss or transfer related Liberi v. IRB Research case.	0.30 170.00/hr	51.00
5/31/2013	- JC	Review numerous items on Pennsylvania Supreme Court website regarding appeal by opposing counsel from suspension order, regarding determining opposing counsel's standing in case.	0.40 170.00/hr	68.00
	- JC	Begin development of insured's reply legal arguments in reply to plaintiffs' lengthy (over 20 pages) Memorandum of Points and Authorities in opposition to insured's anti-SLAPP motion to strike, toward preparation of insured's reply Memorandum of Points and Authorities.	0.90 170.00/hr	153.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/31/2013	- JC	Begin review and analysis of plaintiffs' lengthy (over 20 pages) Memorandum of Points and Authorities in opposition to insured's anti-SLAPP motion to strike, toward preparation of insured's reply Memorandum of Points and Authorities.	1.40 170.00/hr	238.00
	- JC	Begin review and analysis of plaintiffs' numerous cases and statutes cited in lengthy (over 20 pages) Memorandum of Points and Authorities in opposition to insured's anti-SLAPP motion to strike, toward preparation of insured's reply Memorandum of Points and Authorities.	0.80 170.00/hr	136.00
6/1/2013	- JC	Review and analysis of plaintiffs' proposed order on insured, O. Taitz's anti-SLAPP motion to strike.	0.30 170.00/hr	51.00
	- JC	Multiple correspondence with insured, O. Taitz (as counsel for co-defendants), toward preparation of insured's reply in opposition to insured's anti-SLAPP motion to strike.	0.30 170.00/hr	51.00
	- JC	Continue review and analysis of plaintiffs' lengthy (over 20 pages) Memorandum of Points and Authorities in opposition to insured's anti-SLAPP motion to strike, toward preparation of insured's reply Memorandum of Points and Authorities.	0.90 170.00/hr	153.00
	- JC	Begin review and analysis of plaintiffs' lengthy (approximately 90 pages) exhibits to their opposition to insured's anti-SLAPP motion to strike, toward preparation of insured's reply documents.	1.10 170.00/hr	187.00
	- KS	Telephone call with client regarding opposition and strategy.	0.80 170.00/hr	136.00
6/2/2013	- JC	Continue review and analysis of plaintiffs' lengthy (approximately 90 pages) exhibits to their opposition to insured's anti-SLAPP motion to strike, toward preparation of insured's reply documents.	1.60 170.00/hr	272.00
	- JC	Begin drafting of Memorandum of Points and Authorities of insured in opposition to plaintiffs' motion for leave to file opposition to insured's anti-SLAPP motion to strike.	1.20 170.00/hr	204.00
	- JC	Begin review and analysis of proposed legal arguments prepared by insured, O. Taitz (also as counsel for co-defendants) in reply to plaintiffs' opposition to insured's anti-SLAPP motion to strike.	0.50 170.00/hr	85.00
	- JC	Continue review and analysis of plaintiffs' lengthy (over 20 pages) Memorandum of Points and Authorities in opposition to insured's anti-SLAPP motion to strike, toward preparation of insured's reply Memorandum of Points and Authorities.	0.80 170.00/hr	136.00
	- JC	Begin review and analysis of Plaintiffs' request for judicial notice in opposition to anti-SLAPP motion to strike by insured, O. Taitz, toward preparation of insured's objections to request.	0.60 170.00/hr	102.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
6/2/2013	- JC	Begin drafting of lengthy Memorandum of Points and Authorities of insured in reply to plaintiffs' lengthy (over 20 pages) Memorandum of Points and Authorities in opposition to insured's anti-SLAPP motion to strike, pursuant to authority of adjuster Laurie Johnson.	0.60 170.00/hr	102.00
	- JC	Begin review and analysis of plaintiffs' motion for leave to file untimely opposition to insured's anti-SLAPP motion to strike.	0.90 170.00/hr	153.00
	- KS	Conference with client regarding reply brief and opposing counsel's violations.	0.60 170.00/hr	102.00
	- KS	Analyze response by opposing counsel.	1.80 170.00/hr	306.00
	- JC	Begin review and analysis of lengthy proposed arguments and declaration prepared by insured, O. Taitz (also as counsel for co-defendants), in reply to plaintiffs' opposition to insured's anti-SLAPP motion to strike, toward preparation of insured's reply documents, pursuant to authority of adjuster Laurie Johnson.	1.10 170.00/hr	187.00
	- JC	Several telephone conferences with insured, O. Taitz (as counsel for co-defendants), toward preparation of insured's reply in opposition to insured's anti-SLAPP motion to strike.	0.40 170.00/hr	68.00
6/3/2013	- JC	Continue drafting of detailed and lengthy Memorandum of Points and Authorities of insured in opposition to plaintiffs' motion for leave to file opposition to insured's anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	2.10 170.00/hr	357.00
	- JC	Begin drafting detailed declaration for insured, O. Taitz, supporting reply Memorandum of Points and Authorities to plaintiffs' Memorandum of Points and Authorities in opposition to insured's anti-SLAPP motion to strike, and review and analysis of evidence supporting declaration, pursuant to authority of adjuster Laurie Johnson.	2.50 170.00/hr	425.00
	- JC	Continue review and analysis of plaintiffs' lengthy (approximately 90 pages) exhibits to their opposition to insured's anti-SLAPP motion to strike, toward preparation of insured's reply documents.	0.50 170.00/hr	85.00
	- PB	Review court docket for all reply pleadings submitted by Plaintiff in opposition to Orly Taitz 12(b)(6) motion.	0.40 95.00/hr	38.00
	- KS	Conference with client regarding opposing counsel's case law.	1.10 170.00/hr	187.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
6/3/2013	- JC	Continue review and analysis of plaintiffs' lengthy (over 20 pages) Memorandum of Points and Authorities in opposition to insured's anti-SLAPP motion to strike, toward preparation of insured's reply Memorandum of Points and Authorities.	2.50 170.00/hr	425.00
	- JC	Continue review and analysis of lengthy proposed arguments and declaration prepared by insured, O. Taitz (also as counsel for co-defendants), in reply to plaintiffs' opposition to insured's anti-SLAPP motion to strike, toward preparation of insured's reply documents.	1.90 170.00/hr	323.00
	- JC	Numerous conferences with insured, O. Taitz (as counsel for co-defendants), toward preparation of insured's reply in opposition to insured's anti-SLAPP motion to strike.	1.40 170.00/hr	238.00
6/4/2013	- JC	Begin drafting objections of insured, O. Taitz, to plaintiffs' request for judicial notice in opposition to insured's anti-SLAPP motion to strike, pursuant to authority of adjuster Laurie Johnson.	0.40 170.00/hr	68.00
	- JC	Continue review and analysis of Plaintiffs' request for judicial notice in opposition to anti-SLAPP motion to strike by insured, O. Taitz, toward preparation of insured's objections to request.	0.50 170.00/hr	85.00
6/5/2013	- PB	Review and revise Orly Taitz's Opposition to Plaintiff's Motion for Extension regarding 12(b)(6) motion, pursuant to carrier authority from Laurie Johnson.	0.70 95.00/hr	66.50
	- JC	Continue drafting objections of insured, O. Taitz, to plaintiffs' request for judicial notice in opposition to insured's anti-SLAPP motion to strike, pursuant to authority of adjuster Laurie Johnson.	2.40 170.00/hr	408.00
	- JC	Correspondence with insured, O. Taitz, regarding preparation of notice of errata regarding insured's reply to plaintiffs' opposition to insured's anti-SLAPP motion to strike.	0.20 170.00/hr	34.00
	- JC	Begin drafting notice of errata to reply Memorandum of Points and Authorities of insured, O. Taitz, regarding plaintiffs' Memorandum of Points and Authorities in opposition to insured's anti-SLAPP motion to strike, pursuant to authority of adjuster Laurie Johnson.	1.20 170.00/hr	204.00
	- JC	Correspondence with insured, O. Taitz, regarding preparation of objections to plaintiffs' request for judicial notice regarding insured's anti-SLAPP motion to strike.	0.20 170.00/hr	34.00
	- PB	Review and revise Orly Taitz's Declaration in Reply to Plaintiff's Untimely Opposition to 12(b)(6), pursuant to carrier authority from Laurie Johnson.	0.50 95.00/hr	47.50
	- PB	Review and revise Orly Taitz's Reply to Plaintiff's Untimely Opposition to 12(b)(6) motion, pursuant to carrier authority from Laurie Johnson.	0.40 95.00/hr	38.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/6/2013	- KS	Finalize analysis to client regarding malicious prosecution claim.	0.40 170.00/hr	68.00
	- JC	Multiple telephone conferences with insured, O. Taitz, regarding preparation of objections to plaintiffs' request for judicial notice in opposition to insured's anti-SLAPP motion to strike.	0.30 170.00/hr	51.00
	- KS	Finalize correspondence to clients.	0.20 170.00/hr	34.00
6/7/2013	- PB	Draft Table of Contents and Authorities in support of Orly Taitz's reply to untimely opposition to 12(b)(6) motion, pursuant to carrier authority from Laurie Johnson.	2.50 95.00/hr	237.50
	- JC	Begin review and analysis of declaration of plaintiff, P. Berg, in response to insured's reply to plaintiffs' opposition to insured's anti-SLAPP motion to strike.	0.50 170.00/hr	85.00
	- PB	Review and revise Objections by Orly Taitz to Plaintiff's Untimely Request for Judicial Notice, pursuant to carrier authority from Laurie Johnson.	0.80 95.00/hr	76.00
6/8/2013	- JC	Continue review and analysis of declaration of plaintiff, P. Berg, and numerous court docket entries including declarations, transcripts and orders incorporated into P. Berg declaration, in response to insured's reply to plaintiffs' opposition to insured's anti-SLAPP motion to strike.	0.80 170.00/hr	136.00
6/10/2013	- JC	Multiple telephone conferences with insured. O. Taitz (also as counsel for co-defendants) toward preparation of insured's objections to declaration of plaintiff, P. Berg, regarding insured's anti-SLAPP motion to strike.	0.30 170.00/hr	51.00
	- JC	Begin drafting objections of insured, O. Taitz, to declaration of plaintiff, P. Berg, regarding insured's anti-SLAPP motion to strike on key diversity jurisdiction and claim preclusion issues, pursuant to authorization of adjuster L. Johnson.	0.90 170.00/hr	153.00
	- JC	Multiple correspondence with insured, O. Taitz (also as counsel for co-defendants), regarding insured's proposed objections and arguments regarding declaration of plaintiff, P. Berg, in opposition to insured's anti-SLAPP motion to strike.	0.30 170.00/hr	51.00
	- JC	Begin review and analysis of proposed objections and arguments drafted by insured, O. Taitz (also as counsel for co-defendants), regarding declaration of plaintiff, P. Berg, in opposition to insured's anti-SLAPP motion to strike.	0.40 170.00/hr	68.00
6/11/2013	- JC	Begin drafting objections of insured, O. Taitz, to declaration of plaintiff, P. Berg, with revisions by insured, regarding insured's anti-SLAPP motion to strike on key diversity jurisdiction and	1.20 170.00/hr	204.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
		claim preclusion issues, pursuant to authorization of adjuster L. Johnson.		
6/11/2013	- JC	Multiple correspondence with insured, O. Taitz (also as counsel for co-defendants), regarding insured's proposed objections and arguments regarding declaration of plaintiff, P. Berg, in opposition to insured's anti-SLAPP motion to strike.	0.30 170.00/hr	51.00
	- PB	Review and revise Orly Taitz's Objection to Untimely Declaration of Phillip Berg regarding 12(b)(6) motion, pursuant to carrier authority from Laurie Johnson.	0.40 95.00/hr	38.00
6/12/2013	- JC	Draft update with attorney analysis for carrier regarding plaintiffs' opposition to insured's anti-SLAPP motion to strike, and insured's reply documents, regarding upcoming hearing on motion.	0.30 170.00/hr	51.00
6/14/2013	- JC	Begin preparation for hearing on complex anti-SLAPP motion to strike by insured, O. Taitz, pursuant to authorization of adjuster Laurie Johnson.	0.90 170.00/hr	153.00
6/15/2013	- JC	Continue preparation for hearing on complex anti-SLAPP motion to strike by insured, O. Taitz, including review and analysis of all moving, opposition and reply documents, and plaintiffs' related motion for leave, and opposition and reply documents.	1.90 170.00/hr	323.00
6/16/2013	- JC	Continue preparation for hearing on complex anti-SLAPP motion to strike by insured, O. Taitz, including review and analysis of all moving, opposition and reply documents, and plaintiffs' related motion for leave, and opposition and reply documents.	4.20 170.00/hr	714.00
6/17/2013	- JC	Travel to and from court for hearing on insured, O. Taitz's anti-SLAPP motion to strike.	1.20 170.00/hr	204.00
	- JC	Attend hearing on insured's anti-SLAPP motion to strike, plus hearing on Order to Show Cause regarding sanctions against insured, insured's requests for leave to file additional motions, and plaintiffs' motions to compel against Sankey Defendants.	1.70 170.00/hr	289.00
	- JC	Meeting with insured, O. Taitz (as counsel for other defendants), regarding potential appeal from denial of anti-SLAPP motion to strike, and preparation of motions to dismiss.	0.40 170.00/hr	68.00
	- JC	Begin analysis of complex legal issues regarding potential appeal from denial of insured's anti-SLAPP motion to strike, and related ex-parte application to extend time for appeal, in conjunction with insured's FRCP Rule 12 motions to dismiss.	0.50 170.00/hr	85.00
	- JC	Meeting with client regarding preparation for hearing on insured, O. Taitz's anti-SLAPP motion to strike.	0.50 170.00/hr	85.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/18/2013	- JC	Begin review and analysis of applicable authorities regarding potential appeal by insured, O. Taitz, from denial of anti-SLAPP motion, and applicable deadline, and related potential motion to extend deadline for appeal.	0.50 170.00/hr	85.00
	- JC	Begin analysis of complex legal issues regarding potential appeal regarding insured's proposed FRCP Rule 12 (b)(6) motion to dismiss, based on insufficient claims.	0.60 170.00/hr	102.00
	- JC	Multiple correspondence with insured, O. Taitz, regarding potential appeal from denial of anti-SLAPP motion to strike.	0.30 170.00/hr	51.00
	- KS	Telephone call from client regarding appeal and court's recent order.	0.60 170.00/hr	102.00
	- JC	Begin analysis of complex legal issues regarding potential appeal regarding insured's proposed FRCP Rule 12 (b)(1) motion to dismiss, based on lack of court jurisdiction.	0.60 170.00/hr	102.00
	- JC	Begin preparation of comprehensive update with attorney analysis and future handling plan, regarding recent developments including on insured's anti-SLAPP motion to strike, leave to file motions to dismiss and to strike, plaintiffs' discovery motions, Order to Show Cause regarding sanctions, and potential appeal and motion for stay.	0.80 170.00/hr	136.00
6/19/2013	- JC	Begin drafting update with attorney analysis for carrier regarding denial of insured's anti-SLAPP motion, leave to file motions to dismiss, other orders, and related future handling plan.	0.60 170.00/hr	102.00
	- JC	Begin review and analysis of order with findings on insured's anti-SLAPP motion to strike, Order to Show Cause regarding sanctions against insured, insured's requests for leave to file additional motions, and plaintiffs' motions to compel against Sankey Defendants.	0.50 170.00/hr	85.00
	- KS	Amend future handling plan.	0.70 170.00/hr	119.00
	- JC	Review and analysis of notice of association of counsel regarding S. Marcus and Gittler & Bradford for plaintiffs.	0.30 170.00/hr	51.00
	- JC	Continue review and analysis of applicable authorities regarding potential appeal by insured, O. Taitz, from denial of anti-SLAPP motion, and applicable deadline, and related potential motion to extend deadline for appeal.	0.60 170.00/hr	102.00
	- JC	Multiple correspondence with opposing counsel for Sankey defendants regarding proposal to join in insured's potential motions to dismiss.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/19/2013	- JC	Continue analysis of complex legal issues regarding potential appeal regarding insured's proposed FRCP Rule 12 (b)(1) motion to dismiss, based on lack of court jurisdiction.	0.70 170.00/hr	119.00
6/20/2013	- JC	Continue analysis of complex legal issues regarding potential appeal regarding insured's proposed FRCP Rule 12 (b)(6) motion to dismiss, based on insufficient claims.	0.60 170.00/hr	102.00
	- JC	Continue preparation of comprehensive update with attorney analysis and future handling plan, regarding recent developments including on insured's anti-SLAPP motion to strike, leave to file motions to dismiss and to strike, plaintiffs' discovery motions, Order to Show Cause regarding sanctions, and potential appeal and motion for stay.	1.20 170.00/hr	204.00
	- JC	Begin investigation into plaintiffs' new counsel, Randall Berg and Gittler & Bradford.	0.50 170.00/hr	85.00
	- JC	Review and analysis of request for leave, and related correspondence, of opposing counsel for Sankey Defendants to file motion for summary judgment.	0.40 170.00/hr	68.00
	- JC	Begin review and analysis of lengthy (approximately 17 pages) order and report of Pennsylvania Supreme Court in disciplinary proceeding of plaintiffs' counsel, P. Berg, toward removal of opposing counsel as plaintiffs' counsel.	0.60 170.00/hr	102.00
	- KS	Conference with client regarding new appeal.	0.40 170.00/hr	68.00
	- JC	Begin review of court's June 20, 2013 supplemental order regarding sanctions regarding insured, O. Taitz.	0.40 170.00/hr	68.00
	- KS	Conference regarding opposing counsel's disbarment.	0.60 170.00/hr	102.00
	- KS	Correspondence with carrier regarding disbarment.	0.20 170.00/hr	34.00
	- KS	Finalize update to carrier regarding appeal of anti-SLAPP.	0.80 170.00/hr	136.00
	- JC	Multiple correspondence with opposing counsel for Sankey Defendants regarding potential uses of Pennsylvania Supreme Court suspension of opposing counsel P. Berg and related findings.	0.30 170.00/hr	51.00
	- KS	Conference with client regarding opposing counsel's fraud on the court.	0.40 170.00/hr	68.00
	- KS	Conference regarding opposing counsel's request for sanctions.	0.20 170.00/hr	34.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/21/2013	- KS	Finalize response to client.	0.20 170.00/hr	34.00
	- JC	Begin attorney analysis of complex legal issues regarding potential motion for reconsideration of denial of insured's anti-SLAPP motion to strike, regarding Pennsylvania Supreme Court suspension of opposing counsel P. Berg and related findings.	1.30 170.00/hr	221.00
	- JC	Several correspondence with insured, O. Taitz (also as counsel for co-defendants), regarding potential motion for reconsideration of denial of insured's anti-SLAPP motion to strike, regarding Pennsylvania Supreme Court suspension of opposing counsel P. Berg and related findings.	0.40 170.00/hr	68.00
6/24/2013	- JC	Draft update with attorney analysis of potential appeal by insured from denial of anti-SLAPP motion to strike, disciplinary matter against opposing counsel, plaintiffs' request for leave to file motion for attorneys' fees, insured's objections, and court's supplemental order.	0.50 170.00/hr	85.00
	- JC	Begin review and analysis of plaintiffs' 10 page response to brief of insured, O. Taitz, regarding suspension of opposing counsel and revocation of ninth circuit admission.	0.60 170.00/hr	102.00
	- JC	Begin review and analysis of 8 page declaration of opposing counsel, P. Berg, regarding plaintiffs' response to brief of insured, O. Taitz, regarding suspension of opposing counsel, revocation of ninth circuit admission and request for sanctions.	0.40 170.00/hr	68.00
	- KS	Correspondence with carrier regarding law and motion.	0.20 170.00/hr	34.00
	- KS	Telephone call with client regarding today's filing by Berg.	0.30 170.00/hr	51.00
	- KS	Conference regarding possible response by Taitz.	0.40 170.00/hr	68.00
	- JC	Review and analysis of several correspondence between opposing counsel for Sankey defendants, and S. Marcus (new counsel for plaintiffs), regarding potential settlement and defendants' request for leave to file motion for summary judgment.	0.50 170.00/hr	85.00
6/25/2013	- JC	Continue review and analysis of plaintiffs' 10 page response to brief of insured, O. Taitz, regarding suspension of opposing counsel and revocation of ninth circuit admission.	0.40 170.00/hr	68.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/25/2013	- JC	Continue review and analysis of 8 page declaration of opposing counsel, P. Berg, regarding plaintiffs' response to brief of insured, O. Taitz, regarding suspension of opposing counsel, revocation of ninth circuit admission and request for sanctions.	0.30 170.00/hr	51.00
	- JC	Begin review and analysis of 11 page reply brief of insured, O. Taitz (as counsel for co-defendants), regarding brief of insured regarding suspension of opposing counsel, revocation of ninth circuit admission and request for sanctions.	0.60 170.00/hr	102.00
	- JC	Begin review and analysis of 5 page declaration of insured, O. Taitz (as counsel for co-defendants), with 19 pages of exhibits regarding brief of insured regarding suspension of opposing counsel, revocation of ninth circuit admission and request for sanctions.	0.90 170.00/hr	153.00
6/26/2013	- JC	Continue review and analysis of 11 page reply brief of insured, O. Taitz (as counsel for co-defendants), regarding brief of insured regarding suspension of opposing counsel, revocation of ninth circuit admission and request for sanctions.	0.40 170.00/hr	68.00
	- JC	Continue review and analysis of 5 page declaration of insured, O. Taitz (as counsel for co-defendants), with 19 pages of exhibits regarding brief of insured regarding suspension of opposing counsel, revocation of ninth circuit admission and request for sanctions.	0.60 170.00/hr	102.00
6/27/2013	- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of motion for stay regarding insured's appeal.	0.30 170.00/hr	51.00
	- JC	Review multiple correspondence between opposing counsel for plaintiffs and counsel for Sankey defendants, regarding status of P. Berg's representation of plaintiffs and their new counsel, and regarding potential motion or Order to Show Cause regarding status of plaintiffs' representation and potential motion to revoke Berg representation.	0.40 170.00/hr	68.00
	- KS	Correspondence with client regarding opposing counsel's communications.	0.20 170.00/hr	34.00
	- JC	Review and analysis of court's June 27, 2013 order regarding plaintiffs' motion for sanctions, Sankey defendants' motion for summary judgment, and clarifying representation of plaintiffs and new counsel.	0.40 170.00/hr	68.00
	- KS	Telephone call with client regarding new order and future handling.	0.80 170.00/hr	136.00
7/1/2013	- KS	Correspondence from opposing counsel regarding substitution of attorney.	0.20 170.00/hr	34.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
7/2/2013	- JC	Begin preparation of insured's notice of appeal, statement of issues and related documents, in appeal from denial of insured's anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	0.50 170.00/hr	85.00
	- JC	Begin attorney analysis of complex legal issues and related authorities, toward preparation of insured's motion for stay of case pending appeal by insured from denial of insured's anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	0.40 170.00/hr	68.00
7/3/2013	- JC	Continue preparation of insured's notice of appeal, statement of issues and related documents, in appeal from denial of insured's anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	0.40 170.00/hr	68.00
	- JC	Multiple telephone conferences with insured, O. Taitz (as counsel for co-defendants), regarding preparation of request for leave to clarify representation of all plaintiffs.	0.30 170.00/hr	51.00
7/4/2013	- JC	Multiple correspondence with insured and plaintiffs regarding preparation of request for leave to compel plaintiffs to provide addresses for updated service list in case.	0.30 170.00/hr	51.00
7/5/2013	- KS	Conference regarding motion to compel all plaintiffs to respond, pursuant to carrier authority from Laurie Johnson.	0.30 170.00/hr	51.00
7/8/2013	- JC	Continue attorney analysis of complex issues regarding request for leave to clarify representation of plaintiffs, to compel provision of contact information, and separate request for leave to file motion for stay, pursuant to carrier authority from Laurie Johnson.	0.80 170.00/hr	136.00
	- JC	Begin drafting declaration to be filed with notice of appeal, explaining issues regarding representation of plaintiffs and related service issues, pursuant to carrier authority from Laurie Johnson.	1.20 170.00/hr	204.00
	- JC	Multiple correspondence with insured, O. Taitz (also as counsel for co-defendants), toward preparation of request for leave to bring motion to clarify issues regarding representation of plaintiffs.	0.30 170.00/hr	51.00
	- JC	Review several correspondence between insured, O. Taitz (also as counsel for co-defendants), plaintiffs' counsel, Sankey defendants' counsel, regarding insured's request for leave to bring motion to clarify issues regarding representation of plaintiffs, and plaintiffs' response, pursuant to carrier authority from Laurie Johnson.	0.50 170.00/hr	85.00
	- JC	Begin drafting detailed request for leave by insured, O. Taitz, for leave to bring motion to clarify issues regarding representation of plaintiffs, pursuant to carrier authority from Laurie Johnson.	0.80 170.00/hr	136.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
7/8/2013	- KS	Conference with client regarding plaintiffs' information as a requirement for pleadings, and regarding ex parte.	0.60 170.00/hr	102.00
	- KS	Preparation of update to client.	0.60 170.00/hr	102.00
	- KS	Telephone conference with client regarding ex parte.	0.70 170.00/hr	119.00
7/9/2013	- JC	Multiple correspondence with insured, O. Taitz (also as counsel for co-defendants), regarding strategy supporting requests for leave to file ex-parte application to compel Liberi and Ostella plaintiffs to provide service information.	0.30 170.00/hr	51.00
	- JC	Begin review of New Jersey Secretary of State Materials regarding plaintiff, Go Excel Global, regarding legal status of entity, toward potential request to dismiss that plaintiff from case.	0.40 170.00/hr	68.00
	- JC	Continue drafting detailed request for leave by insured, O. Taitz, for leave to bring motion to clarify issues regarding representation of plaintiffs, pursuant to carrier authority from Laurie Johnson.	0.70 170.00/hr	119.00
	- JC	Review correspondence and notice by Sankey Defendants, seeking leave to file ex-parte application to compel plaintiffs to provide service information.	0.40 170.00/hr	68.00
	- JC	Multiple correspondence with opposing counsel for Sankey defendants, regarding preparation of their request for leave joining in request for leave by insured, O. Taitz, to bring motion to clarify issues regarding representation of plaintiffs, pursuant to carrier authority from Laurie Johnson.	0.30 170.00/hr	51.00
	- JC	Begin review of Pennsylvania Secretary of State Materials regarding plaintiff, Law Offices of Philip J. Berg, regarding legal status of entity, toward potential request to dismiss that plaintiff from case.	0.40 170.00/hr	68.00
	- JC	Multiple telephone conferences with insured, O. Taitz (also as counsel for co-defendants), regarding preparation of requests for leave to file ex-parte application to compel Liberi and Ostella plaintiffs to provide service information.	0.30 170.00/hr	51.00
	- JC	Continue drafting declaration to be filed with notice of appeal, explaining issues regarding representation of plaintiffs and related service issues, pursuant to carrier authority from Laurie Johnson.	0.40 170.00/hr	68.00
7/11/2013	- KS	Telephone conference with client.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/11/2013 -	JC	Multiple telephone conference with insured, O. Taitz (also as counsel for several defendants), regarding pending requests for leave to file ex-parte application to compel plaintiffs to provide contact information.	0.30 170.00/hr	51.00
7/15/2013 -	KS	Conference regarding court's new order.	0.40 170.00/hr	68.00
-	KS	Telephone conference with client regarding writ on mandamus.	0.50 170.00/hr	85.00
-	JC	Multiple correspondence with insured, O. Taitz (including as counsel for co-defendants), regarding issues regarding representation of plaintiffs, and pending requests for leave regarding representation issues, in connection with insured's upcoming appeal.	0.30 170.00/hr	51.00
-	JC	Multiple correspondence with insured, O. Taitz (including as counsel for co-defendants), regarding court's 7/15/13 order denying defendants' requests for leave regarding representation issues, and issuing stay in connection with insured's appeal.	0.30 170.00/hr	51.00
-	JC	Review and attorney analysis of court's 7/15/13 order denying defendants' requests for leave regarding representation issues, and issuing stay in connection with insured's appeal.	0.40 170.00/hr	68.00
-	JC	Lengthy telephone conference with insured, O. Taitz (also as counsel for co-defendants), regarding developing strategy in appeal from denial of insured's anti-SLAPP motion, issues regarding plaintiffs' representation in appeal, and insured's proposed petitions for writ of mandate regarding court's 7/15/13 order denying defendants' requests for leave regarding representation issues, pursuant to carrier authority from Laurie Johnson.	0.70 170.00/hr	119.00
-	JC	Begin review and analysis of legal issues regarding potential petition for writ of mandate, as proposed by insured, O. Taitz (also as counsel for co-defendants), regarding court's 7/15/13 order denying defendants' requests for leave regarding representation issues.	0.50 170.00/hr	85.00
7/16/2013 -	JC	Continue preparation of insured, O. Taitz's notice of appeal, representation statement and declaration regarding parties' representation in appeal from denial of insured's anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	0.50 170.00/hr	85.00
-	JC	Multiple correspondence with insured, O. Taitz (also as counsel for co-defendants) regarding preparation of appeal document submissions.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/16/2013 -	KS	Telephone conference with carrier regarding future handling.	0.20 170.00/hr	34.00
7/17/2013 -	JC	Multiple telephone conferences with insured, O. Taitz (also as counsel for co-defendants) regarding proposed petition for writ of mandate regarding plaintiffs' representation.	0.30 170.00/hr	51.00
-	JC	Multiple telephone conferences with clerk of Court of Appeal regarding amendment of service list in appeal by insured, O. Taitz, from denial of anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	0.30 170.00/hr	51.00
-	JC	Draft detailed update for carrier regarding status of appeal by insured, related appeal by other defendants, issues regarding representation of plaintiffs, stay of trial court case, and potential petition for writ of mandate as proposed by insured (as counsel for co-defendants).	0.60 170.00/hr	102.00
-	JC	Review and analysis of notice of appeal and related documents filed by insured, O. Taitz (as counsel for several co-defendants), from denial of defendants' request for leave to file anti-SLAPP motion to strike, and regarding such defendants' petition for writ of mandate regarding plaintiffs' representation, pursuant to carrier authority from Laurie Johnson.	0.50 170.00/hr	85.00
7/18/2013 -	JC	Multiple correspondence with insured, O. Taitz (including as counsel for co-defendants), regarding filing appeal from denial of anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	0.30 170.00/hr	51.00
7/19/2013 -	JC	Correspondence with insured, O. Taitz (also as counsel for co-defendants), regarding proposed motion in insured's appeal to remove Gittler & Bradford as plaintiffs' counsel of record.	0.20 170.00/hr	34.00
-	JC	Begin review and analysis of Court of Appeals' docketing notice, time schedule order, mediation questionnaire guide, and related documents, regarding appeal by insured, O. Taitz, from denial of anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	0.50 170.00/hr	85.00
7/22/2013 -	JC	Begin drafting of mediation questionnaire by insured, O. Taitz, in appeal from denial of anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	0.40 170.00/hr	68.00
-	JC	Begin review and analysis of requests of Gitler & Bradford for leave to file motion to be relieved as counsel for plaintiffs, pursuant to carrier authority from Laurie Johnson.	0.30 170.00/hr	51.00
-	JC	Draft attorney analysis regarding plaintiffs' representation, including regarding requests of Gitler & Bradford for leave to file motion to be relieved as counsel for plaintiffs, pursuant to carrier authority from Laurie Johnson.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/22/2013	- JC	Begin review and analysis of Court of Appeals' docketing notice, time schedule order, mediation questionnaire guide, and related documents, regarding appeal by Defend Our Freedoms Foundations and other Defendants (represented by insured, O. Taitz) from denial of requests for leave to file anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	0.40 170.00/hr	68.00
	- JC	Continue review and analysis of Court of Appeals' docketing notice, time schedule order, mediation questionnaire guide, and related documents, regarding appeal by insured, O. Taitz, from denial of anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	0.40 170.00/hr	68.00
7/23/2013	- KS	Conference regarding new developments.	0.60 170.00/hr	102.00
	- PB	Review and revise mediation questionnaire, pursuant to carrier authority from Laurie Johnson.	0.30 95.00/hr	28.50
	- JC	Continue drafting of mediation questionnaire by insured, O. Taitz, in appeal from denial of anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	0.30 170.00/hr	51.00
	- PB	Review and revise Notice of Appeal and Statement of Representation, pursuant to carrier authority from Laurie Johnson.	0.50 95.00/hr	47.50
7/24/2013	- JC	Multiple telephone conferences insured, O. Taitz (also as counsel for co-defendants), regarding proposal to file motion in insured's appeal to remove Gittler and Bradford as opposing counsel for plaintiffs, pursuant to carrier authority from Laurie Johnson.	0.30 170.00/hr	51.00
	- KS	Finalize update to carrier regarding writ, etc.	0.70 170.00/hr	119.00
7/25/2013	- JC	Review and analysis of mediation questionnaire of plaintiffs, L. Liberi and L. Ostella, in appeal by insured, O. Taitz, regarding denial of insured's anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	0.50 170.00/hr	85.00
	- JC	Review and analysis of plaintiffs' counsel's 7/25/13 correspondence to district court, regarding withdrawal of request to file motion to be relieved as counsel, pursuant to carrier authority from Laurie Johnson.	0.30 170.00/hr	51.00
7/26/2013	- JC	Review application for withdrawal of counsel for plaintiff, P. Berg.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/26/2013	- JC	Review and analysis of mediation questionnaire of plaintiffs, P. Berg and Law Offices of P. Berg, in appeal by insured, O. Taitz, regarding denial of insured's anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	0.40 170.00/hr	68.00
7/29/2013	- JC	Review and analysis of order granting request by Gittler & Bradford to file motion to be relieved as counsel for plaintiffs, P. Berg and Law Offices of P. Berg, pursuant to carrier authority from Laurie Johnson.	0.30 170.00/hr	51.00
	- JC	Review and analysis of order denying request by defendant, Defend Our Freedoms Foundation, for leave to lift stay regarding insured's appeal from denial of anti-SLAPP motion to strike, pursuant to carrier authority from Laurie Johnson.	0.40 170.00/hr	68.00
7/30/2013	- KS	Correspondence with carrier regarding recent orders.	0.20 170.00/hr	34.00
8/1/2013	- KS	Conference call with client regarding her desire to file a new motion.	0.50 170.00/hr	85.00
	- JC	Lengthy telephone conferences with insured, O. Taitz (including as counsel for co-defendants), regarding parties' mediation questionnaires in insured's appeal and proposed appeal from denial of leave by district court for removal of plaintiffs' counsel.	0.60 170.00/hr	102.00
	- KS	Telephone conference with client regarding substitution of attorney issue.	0.40 170.00/hr	68.00
8/2/2013	- JC	Begin attorney analysis of complex issues regarding potential appeal from court's denial of leave for defendants (represented by insured, O. Taitz) to file anti-SLAPP motion, toward potential joinder by defendants in insured's appeal from denial of motion to strike.	0.60 170.00/hr	102.00
8/5/2013	-			
	- JC	Multiple correspondence with insured, O. Taitz (also as counsel for co-defendants), regarding opposing counsel's motion to withdraw as counsel for Berg defendants.	0.30 170.00/hr	51.00
	- JC	Review and analysis of order granting motion of Gittler & Bradford to withdraw as counsel for Berg plaintiffs.	0.30 170.00/hr	51.00
	- JC	Begin review and analysis of lengthy (26 pages) Memorandum of Points and Authorities for motion for summary judgment of defendant, T. Sankey and Sankey Firm Inc., vs. plaintiff, P. Berg.	0.40 170.00/hr	68.00
8/6/2013	- JC	Begin review and analysis of motion by insured, O. Taitz (as counsel for co-defendants), in appeal by co-defendants related to insured's appeal from denial of anti-SLAPP motion to strike, to	0.60 170.00/hr	102.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	compel plaintiffs except P. Berg to file substitution of attorney and to bar Berg representation of plaintiff, Law Offices of P. Berg.		
8/6/2013 - JC	Begin attorney analysis of complex issues regarding potential appeal from court's denial of leave for defendants (represented by insured, O. Taitz) to file anti-SLAPP motion, toward potential joinder by defendants in insured's appeal from denial of motion to strike.	0.30 170.00/hr	51.00
- JC	Multiple telephone conferences with insured, O. Taitz, regarding proposed malicious prosecution by former insured, Y. Taitz.	0.30 170.00/hr	51.00
- JC	Begin review and analysis of plaintiffs' opposition to motion by insured, O. Taitz (as counsel for co-defendants), in appeal by co-defendants related to insured's appeal from denial of anti-SLAPP motion to strike, to compel plaintiffs except P. Berg to file substitution of attorney and to bar Berg representation of plaintiff, Law Offices of P. Berg.	0.70 170.00/hr	119.00
- JC	Begin review and analysis of law regarding standing of fictitious business name toward support for reply by insured, O. Taitz, regarding appeal from denial of anti-SLAPP motion to strike, to compel plaintiffs except P. Berg to file substitution of attorney and to bar Berg representation of plaintiff, Law Offices of P. Berg.	0.60 170.00/hr	102.00
- KS	[REDACTED]	[REDACTED]	[REDACTED]
8/7/2013 - JC	Begin preparation for comprehensive meeting with insured, O. Taitz, regarding overview of status of case and prep of future handling plan, including toward preservation of stay of case pending appeals, potential consolidation of appeals by insured (as defendant) and by insured (as counsel for co-defendants), motion for clarification of plaintiffs' representation in district court and for dismissal of Plaintiff Law Offices of P. Berg, potential petition for mandate regarding representation issues, pending related Pennsylvania case, and motion for disqualification of district court judge	0.70 170.00/hr	119.00
- KS	Telephone conference with client.	0.60 170.00/hr	102.00
- JC	Review and analysis of notice of errata to motion for summary judgment of Sankey defendants against plaintiff, P. Berg.	0.30 170.00/hr	51.00
8/8/2013 - KS	Meeting with client regarding future handling of complex issues regarding appeals, Pennsylvania case, and motion for disqualification of district court judge.	2.00 170.00/hr	340.00
- JC	Lengthy meeting with insured, O. Taitz, regarding overview of status of case and prep of future handling plan, including toward preservation of stay of case pending appeals, potential consolidation of appeals by insured (as defendant) and by	2.00 170.00/hr	340.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	insured (as counsel for co-defendants), motion for clarification of plaintiffs' representation in district court and for dismissal of Plaintiff Law Offices of P. Berg, potential petition for mandate regarding representation issues, pending related Pennsylvania case, and motion for disqualification of district court judge		
8/8/2013 - JC	Continue review and analysis of motion by insured, O. Taitz (as counsel for co-defendants), in appeal by co-defendants related to insured's appeal from denial of anti-SLAPP motion to strike, to compel plaintiffs except P. Berg to file substitution of attorney and to bar Berg representation of plaintiff, Law Offices of P. Berg.	0.70 170.00/hr	119.00
8/9/2013 - JC	Draft detailed correspondence to insured, O. Taitz, following lengthy meeting regarding overview of status of case and prep of future handling plan, including toward preservation of stay of case pending appeals, potential consolidation of appeals by insured (as defendant) and by insured (as counsel for co-defendants), motion for clarification of plaintiffs' representation in district court and for dismissal of Plaintiff Law Offices of P. Berg, potential petition for mandate regarding representation issues, pending related Pennsylvania case, and motion for disqualification of district court judge	0.60 170.00/hr	102.00
- KS	Finalize analysis for client.	0.60 170.00/hr	102.00
8/12/2013 - JC	Begin review and analysis of lengthy separate statement, with proposed findings of fact and law, supporting motion for summary judgment of defendant, T. Sankey and Sankey Firm Inc., vs. plaintiff, P. Berg, including regarding plaintiffs' vicarious liability claims against insured as employer and principal of Sankey Defendants.	0.90 170.00/hr	153.00
8/13/2013 - JC	Continue review and analysis of lengthy Memorandum of Points and Authorities for motion for summary judgment of defendant, T. Sankey and Sankey Firm Inc., vs. plaintiff, P. Berg, including regarding plaintiffs' vicarious liability claims against insured as employer and principal of Sankey Defendants.	0.60 170.00/hr	102.00
8/14/2013 - JC	Continue review and analysis of lengthy separate statement, with proposed findings of fact and law, supporting motion for summary judgment of defendant, T. Sankey and Sankey Firm Inc., vs. plaintiff, P. Berg, including regarding plaintiffs' vicarious liability claims against insured as employer and principal of Sankey Defendants.	0.60 170.00/hr	102.00
- JC	Continue review and analysis of lengthy Memorandum of Points and Authorities for motion for summary judgment of defendant, T. Sankey and Sankey Firm Inc., vs. plaintiff, P. Berg, including regarding plaintiffs' vicarious liability claims against insured as employer and principal of Sankey Defendants.	0.80 170.00/hr	136.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
8/15/2013	- JC	Begin review and analysis of declaration of defendant, T. Sankey, supporting motion for summary judgment of T. Sankey and Sankey Firm Inc. vs. plaintiff, P. Berg, including regarding plaintiffs' vicarious liability claims against insured as employer and principal of Sankey Defendants.	0.70 170.00/hr	119.00
8/16/2013	- JC	Continue review and analysis of lengthy Memorandum of Points and Authorities for motion for summary judgment of defendant, T. Sankey and Sankey Firm Inc., vs. plaintiff, P. Berg, including regarding plaintiffs' vicarious liability claims against insured as employer and principal of Sankey Defendants.	0.30 170.00/hr	51.00
8/29/2013	- JC	Multiple correspondence with insured, O. Taitz, regarding preparation of reporters transcript in her appeal.	0.30 170.00/hr	51.00
9/3/2013	- PB	Review, and response to, e-mail from Jeff Cunningham regarding status of reporter's transcript regarding appeal	0.20 95.00/hr	19.00
	- PB	E-mail Court Reporter, Denise Paddock, regarding request for hearing transcript regarding appeal	0.10 95.00/hr	9.50
	- KS	Telephone call from client regarding court of appeals.	0.20 170.00/hr	34.00
9/6/2013	- PB	Review e-mail and attachment from court reporter, Denise Paddock and save e-transcript to file	0.10 95.00/hr	9.50
9/9/2013	- JC	Review and analysis of order with findings granting motion for summary judgment of Sankey Defendants vs. Plaintiff, P. Berg.	0.40 170.00/hr	68.00
9/10/2013	- JC	Begin drafting comprehensive update and analysis for carrier regarding court's recent grant of summary judgment to Sankey Defendants as to plaintiff P. Berg, potential appeal by P. Berg from summary judgment, preparation of motion for summary judgment against remaining plaintiffs, and status of appeal by insured, O. Taitz, regarding anti-SLAPP motion to strike.	0.60 170.00/hr	102.00
	- KS	Finalize update to carrier.	0.40 170.00/hr	68.00
	- JC	Multiple correspondence with insured, O. Taitz, and counsel for Sankey Defendants, regarding court's recent grant of summary judgment to Sankey Defendants as to plaintiff P. Berg, potential appeal by P. Berg from summary judgment, and preparation of motion for summary judgment against remaining plaintiffs.	0.40 170.00/hr	68.00
9/17/2013	- JC	Review two correspondence of opposing counsel for Sankey defendants, requesting entry of judgment against plaintiff, P. Berg, following grant of summary judgment for Sankey defendants, and future motion for summary judgment against remaining defendants.	0.30 170.00/hr	51.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
9/18/2013 -	JC	Multiple correspondence with insured, O. Taitz, regarding notices from District Court regarding preparation of reporters' transcript, toward preparation of record on appeal in appeal by insured regarding denial of anti-SLAPP motion.	0.30 170.00/hr	51.00
-	JC	Review several notices from District Court regarding preparation of reporters' transcript, toward preparation of record on appeal in appeal by insured, O. Taitz, regarding denial of anti-SLAPP motion.	0.40 170.00/hr	68.00
9/23/2013 -	JC	Review and analysis of court's 9/23/13 order denying Sankey Defendants' request for order of dismissal regarding plaintiff, P. Berg.	0.30 170.00/hr	51.00
9/27/2013 -	JC	Review and analysis of court of appeals' order removing appeals by insured, O. Taitz, and related appeal by defendant, Defend Our Freedoms Foundations, from mediation program and reinstating briefing schedule.	0.40 170.00/hr	68.00
10/7/2013 -	JC	Telephone conferences with insured, O. Taitz (also counsel for several defendants), toward preparation of insured's opening brief in appeal from denial of anti-SLAPP motion to strike, pursuant to authority of adjuster Laurie Johnson.	0.30 170.00/hr	51.00
10/10/2013 -	JC	Review correspondence of insured and defendant, N. Sankey, and related court documents from related case Liberi v. IRB, regarding plaintiffs' pro hac vice application and order for new counsel.	0.40 170.00/hr	68.00
10/21/2013 -	JC	Begin evaluation of complex issues regarding potential change in Ninth Circuit anti-SLAPP law regarding Makaeff case, and potential application to pending appeal by insured O. Taitz from denial of her anti-SLAPP motion to strike, toward preparation of insured's opening brief in appeal, pursuant to authorization of adjuster Laurie Johnson.	0.80 170.00/hr	136.00
10/24/2013 -	JC	Begin review and analysis of numerous cases following Ninth Circuit's Makaeff v. Trump case, regarding applicability of anti-SLAPP motion to strike in Ninth Circuit, toward preparation of insured's opening brief from order denying anti-SLAPP motion to strike.	0.80 170.00/hr	136.00
10/28/2013 -	KS	Conference regarding client's comments regarding Law Offices of P. Berg.	0.40 170.00/hr	68.00
-	JC	Begin review and analysis of court of appeals' order on motion by insured, O. Taitz (as counsel for other appellants), to remove appellees' counsel from appeal by insured's clients from denial of motion for leave to file motion to strike, and regarding representation of defendants, P. Berg and Law Offices of P. Berg, in appeal and insured's related appeal.	0.40 170.00/hr	68.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/28/2013 -	JC	Correspondence with insured, O. Taitz (as counsel for other appellants), regarding insured's motion to remove appellees' counsel from appeal by insured's clients from denial of motion for leave to file motion to strike, and regarding representation of defendants, P. Berg and Law Offices of P. Berg, in appeal and insured's related appeal.	0.30 170.00/hr	51.00
10/29/2013 -	JC	Continue review and analysis of court of appeals' order on motion by insured, O. Taitz (as counsel for other appellants), to remove appellees' counsel from appeal by insured's clients from denial of motion for leave to file motion to strike, and regarding representation of defendants, P. Berg and Law Offices of P. Berg, in appeal and insured's related appeal.	0.40 170.00/hr	68.00
-	JC	Begin review and analysis of viability and effects of potential motion by insured, O. Taitz, for Order to Show Cause regarding representation of appellee Law Office of P. Berg in insured's appeal from denial of insured's anti-SLAPP motion to strike following similar order in related appeal by other defendants.	0.90 170.00/hr	153.00
-	JC	Correspondence with insured, O. Taitz, regarding viability and effects of potential motion by insured for Order to Show Cause regarding representation of appellee Law Office of P. Berg in insured's appeal from denial of insured's anti-SLAPP motion to strike following similar order in related appeal by other defendants.	0.30 170.00/hr	51.00
-	KS	Conference regarding strategy for handling of appellate issue related to the court's order on DOFF's appeal.	0.40 170.00/hr	68.00
-	JC	Begin evaluation of potential motion to consolidate insured, O. Taitz's appeal from denial of anti-SLAPP motion to strike with related appeal by defendants represented by insured, regarding denial of leave to file motion to strike, including analysis of potential advantages and disadvantages of potential motion.	1.10 170.00/hr	187.00
10/30/2013 -	JC	Multiple correspondence with other defense counsel regarding development of motions for summary judgment by Sankey defendants against all defendants, except P. Berg, including to include arguments regarding non-liability of insured both directly and on vicarious liability theories.	0.30 170.00/hr	51.00
11/1/2013 -	KS	Conference regarding effect of dismissal in Pennsylvania case.	0.60 170.00/hr	102.00
11/2/2013 -	JC	Continue review and analysis of numerous cases following Ninth Circuit's Makaeff v. Trump case, regarding applicability of anti-SLAPP motion to strike in Ninth Circuit, toward preparation of insured's opening brief from order denying anti-SLAPP motion to strike pursuant to authorization of adjuster Laurie Johnson.	0.60 170.00/hr	102.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/4/2013	- JC	Begin drafting of comprehensive and detailed opening brief of insured, O. Taitz, in appeal from denial of anti-SLAPP motion to strike, pursuant to authorization of adjuster Laurie Johnson.	1.10 170.00/hr	187.00
	- JC	Multiple correspondence with insured, O. Taitz (also as counsel for various defendants), regarding preparation of insured's opening brief in appeal from denial of anti-SLAPP motion to strike, pursuant to authorization of adjuster Laurie Johnson.	0.30 170.00/hr	51.00
11/6/2013	- JC	Continue drafting of comprehensive and detailed opening brief of insured, O. Taitz, in appeal from denial of anti-SLAPP motion to strike, pursuant to authorization of adjuster Laurie Johnson.	2.10 170.00/hr	357.00
	- JC	Begin drafting insured's motion to disqualify appellee P. Berg from representing appellee Law Offices of P. Berg in insured's appeal from denial of anti-SLAPP motion to strike, pursuant to authority of adjuster Laurie Johnson.	0.40 170.00/hr	68.00
11/8/2013	- JC	Correspondence with insured, O. Taitz, regarding preparation of her opening brief in appeal, pursuant to authorization of adjuster Laurie Johnson.	0.20 170.00/hr	34.00
	- JC	Continue drafting of comprehensive and detailed opening brief of insured, O. Taitz, in appeal from denial of anti-SLAPP motion to strike, pursuant to authorization of adjuster Laurie Johnson.	3.10 170.00/hr	527.00
11/11/2013	- JC	Begin preparation of voluminous record on appeal supporting opening brief of insured, O. Taitz, in appeal from denial of anti-SLAPP motion to strike, pursuant to authorization of adjuster Laurie Johnson.	0.90 170.00/hr	153.00
	- KS	Conference regarding opening brief.	0.80 170.00/hr	136.00
11/12/2013	- KS	Conference regarding opening brief.	0.40 170.00/hr	68.00
11/19/2013	- KS	Conference with carrier regarding status.	0.20 170.00/hr	34.00
	- JC	Multiple correspondence with insured, O. Taitz (including as counsel for co-defendant Defend Our Freedoms Foundations), regarding DOFF's motion to dismiss claims of plaintiff, Law Offices of P. Berg, in DOFF's appeal and preparation of related motion to dismiss in insured's related appeal.	0.30 170.00/hr	51.00
	- JC	Draft update with attorney analysis regarding insured's pending appeal, related appeal by other defendants, status of district court case, and future handling recommendation regarding motion to dismiss plaintiff, Law Offices of P. Berg, in appeal of insured.	0.50 170.00/hr	85.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/22/2013 -	JC	Continue preparation of voluminous record on appeal, in support of insured's appeal from denial of anti-SLAPP motion to strike, pursuant to authorization of adjuster Laurie Johnson.	0.60 170.00/hr	102.00
11/26/2013 -	KS	Update to carrier.	0.60 170.00/hr	102.00
11/29/2013 -	JC	Continue drafting insured's motion to disqualify appellee P. Berg from representing appellee Law Offices of P. Berg in insured's appeal from denial of anti-SLAPP motion to strike, pursuant to authority of adjuster Laurie Johnson.	0.70 170.00/hr	119.00
12/1/2013 -	JC	Begin review and analysis of voluminous district court docket regarding potential motion to disqualify Gittler & Bradford firm from representing appellees L. Liberi and L. Ostella in appeal by insured O. Taitz from denial of anti-SLAPP motion to strike.	1.10 170.00/hr	187.00
12/2/2013 -	JC	Begin drafting insured's motion to bar P. Berg from representing appellee, Law Offices of P. Berg, in insured's appeal from denial of anti-SLAPP motion to strike, due to P. Berg's suspension and for stay of briefing, pursuant to authority of adjuster Laurie Johnson.	0.90 170.00/hr	153.00
-	JC	Begin drafting insured's motion to require proof of corporate standing by appellee Go Excel Global in insured's appeal from denial of anti-SLAPP motion to strike, pursuant to authority of adjuster Laurie Johnson.	0.60 170.00/hr	102.00
-	JC	Begin drafting insured's motion to bar opposing counsel from representing appellees in insured's appeal from denial of anti-SLAPP motion to strike, due to lack of authority to represent parties, pursuant to authority of adjuster Laurie Johnson.	0.70 170.00/hr	119.00
-	JC	Begin review and analysis of lengthy (approximately 30 pages) opinion of Court of Appeals in key Makaeff case, regarding anti-SLAPP relief and appealability issues in Ninth Circuit, toward preparation of and support for insured's appeal from denial of anti-SLAPP motion to strike.	0.80 170.00/hr	136.00
12/3/2013 -	JC	Multiple correspondence with insured, O. Taitz (also as counsel for co-defendants), regarding preparation of several motions in insured's appeal from denial of anti-SLAPP motion to strike to first amended complaint.	0.30 170.00/hr	51.00
-	JC	Detailed correspondence with all opposing counsel regarding insured, O. Taitz's motions in insured's appeal from denial of anti-SLAPP motion to strike to first amended complaint.	0.30 170.00/hr	51.00
-	JC	Continue drafting insured's motion to require proof of corporate standing by appellee Go Excel Global in insured's appeal from denial of anti-SLAPP motion to strike, pursuant to authority of adjuster Laurie Johnson.	1.80 170.00/hr	306.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/3/2013	- JC	Continue review and analysis of lengthy (approximately 30 pages) opinion of Court of Appeals in key Makaefeff case, regarding anti-SLAPP relief and appealability issues in Ninth Circuit, toward preparation of and support for insured's appeal from denial of anti-SLAPP motion to strike.	1.50 170.00/hr	255.00
	- JC	Continue drafting insured's motion to bar P. Berg from representing appellee, Law Offices of P. Berg, in insured's appeal from denial of anti-SLAPP motion to strike, due to P. Berg's suspension and for stay of briefing, pursuant to authority of adjuster Laurie Johnson.	1.40 170.00/hr	238.00
	- JC	Continue drafting insured's motion to bar opposing counsel from representing appellees in insured's appeal from denial of anti-SLAPP motion to strike, due to lack of authority to represent parties, pursuant to authority of adjuster Laurie Johnson.	1.50 170.00/hr	255.00
12/4/2013	- JC	Continue drafting insured's motion to bar P. Berg from representing appellee, Law Offices of P. Berg, in insured's appeal from denial of anti-SLAPP motion to strike, due to P. Berg's suspension and for stay of briefing, pursuant to authority of adjuster Laurie Johnson.	0.80 170.00/hr	136.00
	- JC	Continue drafting insured's motion to require proof of corporate standing by appellee Go Excel Global in insured's appeal from denial of anti-SLAPP motion to strike, pursuant to authority of adjuster Laurie Johnson.	0.90 170.00/hr	153.00
	- JC	Continue drafting insured's motion to bar opposing counsel from representing appellees in insured's appeal from denial of anti-SLAPP motion to strike, due to lack of authority to represent parties, pursuant to authority of adjuster Laurie Johnson.	0.60 170.00/hr	102.00
12/5/2013	- JC	Several correspondence with insured, O. Taitz (also as counsel for co-defendants), regarding plaintiffs' response to meet and confer correspondence regarding insured's motions in appeal from denial of anti-SLAPP motion to strike, and toward preparation of motions.	0.60 170.00/hr	102.00
	- JC	Correspondence with all opposing counsel regarding insured's motions in appeal from denial of anti-SLAPP motion to strike.	0.20 170.00/hr	34.00
	- JC	Begin review and analysis of plaintiffs' opposition to motion of defendant, Defend Our Freedoms Foundation, regarding support for insured, O. Taitz's motions in appeal from denial of anti-SLAPP motion to strike.	0.80 170.00/hr	136.00
	- KS	Conference regarding client's request that we bring three new motions.	0.60 170.00/hr	102.00
12/6/2013	- PB	E-file 3x emergency motions barring, etc. representation of Plaintiffs submitted on behalf of Defendant, Orly Taitz	0.10 95.00/hr	9.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/6/2013	- PB	Contact 9th Circuit Motions department, pursuant to instruction by attorney Jeff Cunningham, to confirm e-filing of 3x emergency motions barring, etc. representation of Plaintiffs submitted on behalf of Defendant, Orly Taitz	0.10 95.00/hr	NO CHARGE
	- PB	Prepare Certificate of Service regarding 3x Emergency Motions barring, etc. representation of Plaintiffs filed on behalf of Defendant, Orly Taitz.	0.20 95.00/hr	19.00
12/8/2013	- KS	Correspondence with carrier regarding new law and motion.	0.40 170.00/hr	68.00
12/9/2013	- JC	Continue drafting lengthy and complex insured's opening brief in appeal from denial of anti-SLAPP motion to strike, incorporating several revisions by insured (as counsel for various defendants), pursuant to authority of adjuster Laurie Johnson.	3.20 170.00/hr	544.00
	- JC	Continue preparation of voluminous excerpts of record supporting insured's opening brief in appeal from denial of anti-SLAPP motion to strike, pursuant to authority of adjuster Laurie Johnson.	1.20 170.00/hr	204.00
12/10/2013	- JC	Begin review and analysis of lengthy Memorandum of Points and Authorities of defendants, T. Sankey and Sankey Firm, supporting motion for summary judgment against plaintiffs, L. Liberi and L. Ostella.	0.80 170.00/hr	136.00
12/12/2013	- JC	Continue review and analysis of lengthy Memorandum of Points and Authorities of defendants, T. Sankey and Sankey Firm, supporting motion for summary judgment against plaintiffs, L. Liberi and L. Ostella.	1.20 170.00/hr	204.00
	- JC	Begin review and analysis of New Jersey Secretary of State materials regarding plaintiff, Go Excel Global, toward preparation of insured's reply to opposition to motion to bar Go Excel Global and Berg Law Offices from participating in insured's appeal, due to lack of standing.	0.50 170.00/hr	85.00
	- JC	Begin review and analysis of plaintiffs' opposition to insured's motion to bar plaintiffs, Berg Law Offices and Go Excel Global, from participating in insured's appeal, due to lack of standing, toward preparation of reply to opposition.	1.10 170.00/hr	187.00
	- JC	Begin review and analysis of plaintiffs' opposition to insured's motion to bar Gittler & Bradford firm from representing plaintiffs in insured's appeal, toward preparation of insured's reply to opposition.	1.10 170.00/hr	187.00
12/13/2013	- JC	Begin drafting reply Memorandum of Points and Authorities to plaintiffs' opposition to insured's motion to dismiss plaintiffs, Berg Offices and Go Excel Global, in insured's appeal, pursuant to authorization of adjuster Laurie Johnson.	1.20 170.00/hr	204.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/14/2013 -	JC	Begin drafting reply Memorandum of Points and Authorities to plaintiffs' opposition to insured's motion to bar Gittler & Bradford from representing plaintiffs in insured's appeal, pursuant to authorization of adjuster Laurie Johnson.	1.10 170.00/hr	187.00
12/16/2013 -	JC	Begin drafting reply Memorandum of Points and Authorities regarding insured's motion to bar opposing counsel P. Berg from representing plaintiff, Berg Law Offices, in insured's appeal, pursuant to authorization of adjuster Laurie Johnson.	0.60 170.00/hr	102.00
-	JC	Continue drafting reply Memorandum of Points and Authorities to plaintiffs' opposition to insured's motion to bar Gittler & Bradford from representing plaintiffs in insured's appeal, pursuant to authorization of adjuster Laurie Johnson.	0.80 170.00/hr	136.00
-	JC	Continue drafting reply Memorandum of Points and Authorities to plaintiffs' opposition to insured's motion to dismiss plaintiffs, Berg Offices and Go Excel Global, in insured's appeal, pursuant to authorization of adjuster Laurie Johnson.	0.60 170.00/hr	102.00
12/17/2013 -	JC	Multiple correspondence and telephone conferences with insured, O. Taitz (as appellant and counsel for other defendants), toward preparation of reply briefs regarding insured's three motions against appellees in insured's appeal from denial of anti-SLAPP motion to strike, pursuant to authorization of adjuster Laurie Johnson.	0.60 170.00/hr	102.00
12/24/2013 -	JC	Begin drafting comprehensive attorney analysis and update to carrier regarding insured's appeal from denial of anti-SLAPP motion to strike, related appeal by other defendants, recent court of appeal decisions affecting appeals, insured's motions in appeal, order on motions, and status of district court case including Sankey defendants' motion for summary judgment.	0.80 170.00/hr	136.00
1/6/2014 -	KS	Conference with client regarding possible cross claims.	0.40 170.00/hr	68.00
1/7/2014 -	KS	Analyze client's evidence of tampering with website and potential defamation.	0.80 170.00/hr	136.00
-	JC	Begin review and analysis of voluminous Memorandum of Points and Authorities, declarations, exhibits, request for judicial notice and evidentiary objections of plaintiffs in opposition to motion for summary judgment of Sankey Defendants.	0.40 170.00/hr	68.00
1/10/2014 -	JC	Conference regarding future handling, including toward development of evidence supporting insured's potential counter-claim.	0.50 170.00/hr	85.00
1/20/2014 -	KS	Conference regarding effect of new ruling in Obsidian v. Cox Communications , and its effects on client's matter.	0.60 170.00/hr	102.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
1/20/2014	- JC	Correspondence with insured (also as counsel for co-defendants) regarding recent Obsidian v. Cox opinion of Court of Appeals, regarding First Amendment rights of internet bloggers, toward potential support for insured's appeal from denial of anti-SLAPP motion to strike.	0.20 170.00/hr	34.00
	- JC	Begin review and analysis of recent Obsidian v. Cox opinion of Court of Appeals, regarding First Amendment rights of internet bloggers, toward potential support for insured's appeal from denial of anti-SLAPP motion to strike.	0.50 170.00/hr	85.00
1/21/2014	- JC	Multiple telephone conference with insured O. Taitz (also as counsel for co-defendants) regarding development of potential counter-claim vs. plaintiffs.	0.30 170.00/hr	51.00
1/22/2014	- KS	Conference regarding possible new claims against client in Florida, and deposition notice that could effect outcome in Federal action.	0.80 170.00/hr	136.00
1/23/2014	- JC	Begin review and analysis of Pennsylvania District Court's lengthy (over 30 pages) order and findings in related Liberi v. IRB case, toward preparation of objections and potential motion to quash by insured to Subpoena Duces Tecum issued to her in related case.	1.20 170.00/hr	204.00
	- JC	Correspondence with insured regarding Subpoena Duces Tecum issued by plaintiffs to her in related Ostella v. IRB case.	0.20 170.00/hr	34.00
	- JC	Begin review and analysis of detailed Subpoena Duces Tecum issued to insured in related Liberi v. IRB case, toward preparation of objections and potential motion to quash.	0.50 170.00/hr	85.00
	- KS	Conference regarding potential effect of PA case order.	0.30 170.00/hr	51.00
	- KS	Telephone call from client regarding order in PA case.	0.20 170.00/hr	34.00
1/24/2014	- JC	Begin review and analysis of Pennsylvania District Court's lengthy (over 30 pages) order and findings in related Liberi v. IRB case, toward preparation of objections and potential motion to quash by insured to Subpoena Duces Tecum issued to her in related case.	0.90 170.00/hr	153.00
1/25/2014	- JC	Continue review and analysis of detailed Subpoena Duces Tecum issued to insured in related Liberi v. IRB case, toward preparation of objections and potential motion to quash.	1.40 170.00/hr	238.00
1/26/2014	- JC	Draft evaluation to carrier regarding Subpoena Duces Tecum issued to insured in related Ostella v. IRB Research case, including regarding objections and potential motion to quash.	0.40 170.00/hr	68.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
1/27/2014	- KS	Finalize update to carrier regarding future handling.	0.70 170.00/hr	119.00
	- JC	Review and analysis of Sankey Defendants' evidentiary objections to declaration of R. Lustig submitted by plaintiffs in opposition to Sankey motion for summary judgment, toward preparation for upcoming hearing on motion.	0.40 170.00/hr	68.00
1/28/2014	- KS	Conference regarding possible effect of Florida case in our "Stay".	0.50 170.00/hr	85.00
	- JC	Review and analysis of Sankey Defendants' supplemental evidentiary objections to declarations submitted by plaintiffs in opposition to Sankey motion for summary judgment, toward preparation for upcoming hearing on motion.	0.40 170.00/hr	68.00
	- JC	Begin review and analysis of lengthy complaint (over 60 pages) of plaintiffs in related Ostella v. IRB case, toward preparation of objections of insured O. Taitz to Subpoena Duces Tecum issued in Ostella case, barred by stay of discovery in Liberi v. Taitz case.	0.40 170.00/hr	68.00
	- JC	Review additional information provided by insured O. Taitz regarding related Ostella v. IRB case, toward preparation of objections to Subpoena Duces Tecum issued to insured in case, in violation of stay in Liberi case.	0.50 170.00/hr	85.00
1/29/2014	- KS	Conference regarding client's requested handling of related discovery in out-of-state cases.	0.40 170.00/hr	68.00
	- KS	Conference regarding today's court order and effect on appeal.	0.40 170.00/hr	68.00
	- JC	Continue review and analysis of file materials including in related Ostella v. IRB case, toward preparation of objections to Subpoena Duces Tecum issued to insured in case, in violation of stay in Liberi case.	0.60 170.00/hr	102.00
1/30/2014	- JC	Begin review and analysis of court of appeal's order on insured's three motions in her appeal, including as to representation of plaintiffs in appeal, and stay of briefing.	0.40 170.00/hr	68.00
1/31/2014	- JC	Begin review of materials including declaration of insured's employee, toward support for insured's objections to Subpoena Duces Tecum issued to her in related Ostella v. IRB case, and pursuant to stay of discovery in Liberi v. Taitz case.	0.50 170.00/hr	85.00
2/1/2014	- JC	Review and analysis of declaration of R. Lustig regarding plaintiffs' reply to reply of Sankey defendants regarding their motion for summary judgment on first amended complaint, toward preparation for upcoming hearing.	0.40 170.00/hr	68.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/1/2014 -	JC	Begin review and analysis of Sankey defendants' lengthy (16 pages) reply Memorandum of Points and Authorities regarding motion for summary judgment on first amended complaint, toward preparation for upcoming hearing.	0.70 170.00/hr	119.00
-	JC	Continue review and analysis of plaintiffs' voluminous Memorandum of Points and Authorities, declarations and other evidence in opposition to Sankey defendants' motion for summary judgment on first amended complaint, toward preparation for upcoming hearing.	0.80 170.00/hr	136.00
2/2/2014 -	JC	Review and analysis of M. Colen declaration with exhibits supporting Sankey defendants' reply Memorandum of Points and Authorities regarding motion for summary judgment on first amended complaint, toward preparation for upcoming hearing.	0.50 170.00/hr	85.00
-	JC	Continue review and analysis of Sankey defendants' lengthy (16 pages) reply Memorandum of Points and Authorities regarding motion for summary judgment on first amended complaint, toward preparation for upcoming hearing.	0.60 170.00/hr	102.00
2/3/2014 -	JC	Travel to and from court for hearing on motion for summary judgment of Defendants, T. Sankey and Sankey Firm, against plaintiffs, toward potential use in defense of insured, O.Taitz.	1.40 170.00/hr	238.00
-	JC	Begin drafting of declaration for insured supporting objections to Subpoena Duces Tecum in related Ostella case.	0.40 170.00/hr	68.00
-	JC	Attend hearing on motion for summary judgment of Defendants, T. Sankey and Sankey Firm, against plaintiffs, toward potential use in defense of insured, O.Taitz.	1.10 170.00/hr	187.00
2/5/2014 -	JC	Continue drafting detailed objections to Subpoena Duces Tecum issued to insured, O. Taitz, in related Ostella case.	2.10 170.00/hr	357.00
2/6/2014 -	JC	Begin review of insured's revisions and additions to detailed objections to Subpoena Duces Tecum issued in related Ostella case.	0.40 170.00/hr	68.00
-	JC	Begin drafting detailed objections of insured, O. Taitz, to Subpoena Duces Tecum issued in related Ostella case, incorporating revisions of insured to objections.	0.70 170.00/hr	119.00
-	JC	Multiple correspondence with insured, O. Taitz, regarding insured's revisions and additions to detailed objections to Subpoena Duces Tecum issued in related Ostella case.	0.30 170.00/hr	51.00
3/10/2014 -	TD	Draft memorandum regarding findings of investigation into bankruptcy of Philip Berg	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/10/2014 -	TD	Review and analyze bankruptcy filings of Philip Berg in Eastern District of Pennsylvania in preparation for attempt to Stay court action pending outcome of said bankruptcy.	1.00 170.00/hr	170.00
3/13/2014 -	JC	Begin drafting comprehensive update and analysis for carrier regarding pending appeals, motion practice in appeals, status of District Court case and summary judgment for remaining defendants, and status of related Pennsylvania case.	1.10 170.00/hr	187.00
3/14/2014 -	JC	Review of materials regarding plaintiff, P. Berg, concerning Berg bankruptcy case and motions to reinstate bankruptcy case after dismissal, regarding analysis of issues regarding stay of Liberi v. Taitz District Court case and stay in related appeals.	0.40 170.00/hr	68.00
3/17/2014 -	KS	Finalize detailed update to carrier.	0.80 170.00/hr	136.00
3/20/2014 -	JC	Multiple telephone conferences with insured regarding briefing schedule in insured's appeal.	0.30 170.00/hr	51.00
4/23/2014 -	JC	Review and analysis of court of appeal's dockets in appeals by insured O. Taitz and defendant, Defend Our Freedoms Foundations, regarding anti-SLAPP motion to strike, including regarding pending motions by appellants in cases.	0.30 170.00/hr	51.00
5/2/2014 -	JC	Begin review and analysis of recent ninth circuit court of appeal decisions regarding applicability of California anti-SLAPP law, regarding insured's appeal to ninth circuit from denial of anti-SLAPP motion to strike.	0.50 170.00/hr	85.00
5/5/2014 -	JC	Begin review and analysis of deposition subpoena served on insured in related Ostella v. IRB case, toward preparation of objections to subpoena and potential motion for protective order.	0.30 170.00/hr	51.00
-	JC	Multiple correspondence with insured regarding deposition subpoena served on insured in related Ostella v. IRB case, and toward preparation of objections to subpoena.	0.30 170.00/hr	51.00
5/6/2014 -	KS	Correspondence with carrier regarding protective order.	0.20 170.00/hr	34.00
-	KS	Correspondence with client regarding new subpoena.	0.30 170.00/hr	51.00
-	JC	Continue review and analysis of deposition subpoena served on insured in related Ostella v. IRB case, and review legal authorities regarding preparation of objections and motion to quash subpoena, toward preparation of objections to subpoena and potential motion for protective order.	0.70 170.00/hr	119.00
5/9/2014 -	JC	Continue review and analysis of legal authorities regarding preparation of objections and motion to quash by insured O. Taitz to deposition subpoena in related Ostella v. IRB case, and	2.10 170.00/hr	357.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
	begin review of lengthy docket and pleadings in Ostella case, toward preparation of objections to subpoena and potential motion for protective order.		
5/12/2014 - JC	Begin drafting lengthy and detailed objections by insured O. Taitz to deposition subpoena in related Ostella v. IRB case, toward meet and confer regarding potential motion to quash or for protective order.	1.40 170.00/hr	238.00
- JC	Continue review and analysis of legal authorities regarding preparation of objections and motion to quash by insured O. Taitz to deposition subpoena in related Ostella v. IRB case, and begin review of lengthy docket and pleadings in Ostella case, toward preparation of objections to subpoena and potential motion for protective order.	0.80 170.00/hr	136.00
5/13/2014 - JC	Multiple telephone conferences with insured, O. Taitz, regarding revisions lengthy and detailed objections by insured to deposition subpoena in related Ostella v. IRB case, toward meet and confer regarding potential motion to quash or for protective order.	0.30 170.00/hr	51.00
- JC	Begin drafting revisions requested by insured, O. Taitz, following telephone conferences with insured to lengthy and detailed objections by insured to deposition subpoena in related Ostella v. IRB case, toward meet and confer regarding potential motion to quash or for protective order.	0.90 170.00/hr	153.00
5/14/2014 - TD	Investigate Plaintiffs Liberi and Ostella regarding: possible Bankruptcies	1.50 170.00/hr	255.00
- JC	Continue drafting revisions requested by insured, O. Taitz, regarding potential bankruptcy cases by multiple plaintiffs to lengthy and detailed objections by insured to deposition subpoena in related Ostella v. IRB case, toward meet and confer regarding potential motion to quash or for protective order.	0.50 170.00/hr	85.00
- JC	Multiple telephone conferences with insured O. Taitz regarding potential bankruptcy cases for plaintiffs, and use of bankruptcy cases and stays in related cases.	0.30 170.00/hr	51.00
5/15/2014 - JC	Begin drafting motion of insured, O. Taitz, to quash deposition subpoena in Ostella v. IRB Case, related to Liberi case and pursuant to stay order in Liberi case.	0.60 170.00/hr	102.00
5/19/2014 - JC	Correspondence with insured O. Taitz regarding plaintiffs' response in related case Ostella v. IRB regarding objections to deposition subpoena, and preparation of motion to quash.	0.30 170.00/hr	51.00
- JC	Correspondence with opposing counsel for plaintiffs in Ostella case regarding potential motion of insured, O. Taitz, to quash deposition subpoena in Ostella v. IRB Case, related to Liberi case and pursuant to stay order in Liberi case.	0.30 170.00/hr	51.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/20/2014	- JC	Begin drafting detailed declaration of insured, O. Taitz, supporting motion to quash deposition subpoena issued to insured in related Ostella case, for protective order.	1.10 170.00/hr	187.00
	- JC	Continue drafting motion to quash deposition subpoena issued to insured in related Ostella case, for protective order, and for sanctions.	1.60 170.00/hr	272.00
	- JC	Review and analysis of court of appeal's order with findings on insured's three motions in appeal, and setting briefing schedule in appeal.	0.40 170.00/hr	68.00
	- JC	Multiple correspondence with insured O. Taitz regarding court of appeal's recent order regarding motions to dismiss certain plaintiffs in appeal.	0.30 170.00/hr	51.00
5/21/2014	- JC	Multiple correspondence with insured O. Taitz regarding motion to quash deposition subpoena in related Ostella v. IRB case.	0.30 170.00/hr	51.00
	- JC	Conduct telephonic meet and confer conference with opposing counsel in related Ostella case, regarding insured, O. Taitz's motion to quash deposition subpoena issued to insured in related Ostella case, and for protective order.	0.40 170.00/hr	68.00
	- JC	Continue drafting detailed declaration of insured, O. Taitz, supporting motion to quash deposition subpoena issued to insured in related Ostella case, for protective order.	1.80 170.00/hr	306.00
5/28/2014	- TD	Research Philip Berg bankruptcy history and status of most current bankruptcy filing in Easter Penn. dist.	2.50 170.00/hr	425.00
5/29/2014	- JC	Review updated documents regarding appellee P. Berg bankruptcy case, toward preparation of potential motion to bar P. Berg from participating in insured's appeal from denial of anti-SLAPP motion to strike.	0.40 170.00/hr	68.00
6/1/2014	- JC	Begin drafting insured's detailed and lengthy opening brief in appeal from denial of anti-SLAPP motion to strike to amended complaint, pursuant to carrier authority.	1.80 170.00/hr	306.00
6/2/2014	- JC	Continue drafting insured's detailed and lengthy opening brief in appeal from denial of anti-SLAPP motion to strike to amended complaint, pursuant to carrier authority.	2.40 170.00/hr	408.00
6/4/2014	- JC	Continue drafting insured's detailed and lengthy opening brief in appeal from denial of anti-SLAPP motion to strike to amended complaint, pursuant to carrier authority.	1.50 170.00/hr	255.00
6/5/2014	- JC	Draft attorney analysis and update for carrier regarding insured's appeal, motions in appeal and briefing schedule, status of bankruptcy case of plaintiff P. Berg, and status regarding related Ostella v. IRB case.	0.40 170.00/hr	68.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/6/2014 -	JC	Continue drafting insured's detailed and lengthy opening brief in appeal from denial of anti-SLAPP motion to strike to amended complaint, pursuant to carrier authority.	3.30 170.00/hr	561.00
6/9/2014 -	JC	Continue drafting insured's detailed and lengthy opening brief in appeal from denial of anti-SLAPP motion to strike to amended complaint, pursuant to carrier authority.	2.80 170.00/hr	476.00
-	JC	Continue preparation of insured's voluminous appendix of record on appeal supporting appeal from denial of anti-SLAPP motion to strike to amended complaint, pursuant to carrier authority.	1.90 170.00/hr	323.00
6/10/2014 -	JC	Continue drafting insured's detailed and lengthy opening brief in appeal from denial of anti-SLAPP motion to strike to amended complaint, pursuant to carrier authority.	2.20 170.00/hr	374.00
6/11/2014 -	JC	Begin review of court records regarding bankruptcy case of plaintiff, P. Berg, for potential use in motion in insured's appeal to dismiss P. Berg as party in appeal.	0.40 170.00/hr	68.00
6/12/2014 -	KS	Amend draft for appeal.	0.80 170.00/hr	136.00
-	TD	Analyze bankruptcy law regarding bankruptcy of P. Berg toward preparation of opening brief.	1.40 170.00/hr	238.00
-	JC	Continue drafting insured's detailed and lengthy opening brief in appeal from denial of anti-SLAPP motion to strike to amended complaint, pursuant to carrier authority.	1.90 170.00/hr	323.00
-	JC	Continue preparation of insured's voluminous appendix of record on appeal supporting appeal from denial of anti-SLAPP motion to strike to amended complaint, pursuant to carrier authority.	2.90 170.00/hr	493.00
6/13/2014 -	JC	Review and analysis of court documents including P. Berg Statement of Financial Affairs, listing Liberi case as asset of estate, toward support for insured's potential motion to bar P. Berg from participating in appeal.	0.50 170.00/hr	85.00
6/14/2014 -	JC	Multiple correspondence with insured O. Taitz regarding preparation of opening brief in appeal.	0.30 170.00/hr	51.00
-	JC	Continue drafting insured's detailed and lengthy opening brief in appeal from denial of anti-SLAPP motion to strike to amended complaint, pursuant to carrier authority.	2.50 170.00/hr	425.00
6/16/2014 -	PB	Review and analysis of voluminous documents for use in excerpts of record	3.00 95.00/hr	285.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/16/2014	- JC	Multiple correspondence with insured O. Taitz regarding preparation of opening brief in appeal.	0.30 170.00/hr	51.00
	- JC	Continue drafting insured's detailed and lengthy opening brief in appeal from denial of anti-SLAPP motion to strike to amended complaint, pursuant to carrier authority.	2.30 170.00/hr	391.00
	- KS	Work on opening brief.	0.80 170.00/hr	136.00
	- JC	Continue preparation of insured's voluminous appendix of record on appeal supporting appeal from denial of anti-SLAPP motion to strike to amended complaint, pursuant to carrier authority.	2.30 170.00/hr	391.00
6/17/2014	- JC	Multiple telephone conferences and correspondence with insured O. Taitz (also as counsel for co-defendants in related appeal) regarding preparation of excerpts on appeal in insured's and co-defendants' appeals.	0.50 170.00/hr	85.00
	- JC	Continue drafting insured's detailed and lengthy opening brief in appeal from denial of anti-SLAPP motion to strike to amended complaint, pursuant to carrier authority.	3.70 170.00/hr	629.00
	- PB	Begin draft of excerpts of record volume 1 in support of opening brief to 9th circuit appeal	2.50 95.00/hr	237.50
	- JC	Continue preparation of insured's voluminous appendix of record on appeal supporting appeal from denial of anti-SLAPP motion to strike to amended complaint, pursuant to carrier authority.	2.80 170.00/hr	476.00
	- PB	Begin draft of excerpts of record volume 2 in support of opening brief filed in 9th circuit	3.00 95.00/hr	285.00
	- KS	Examine court transcript from Plaintiff's prior hearings in Philadelphia.	1.40 170.00/hr	238.00
	- KS	Conference regarding client's multiple requests for additional arguments.	0.60 170.00/hr	102.00
	- PB	Begin draft of excerpts of record volume 3 in support of opening brief to 9th circuit appeal	1.50 95.00/hr	142.50
6/18/2014	- KS	Correspondence to client regarding not accepting legal analysis for DOFF.	0.40 170.00/hr	68.00
	- PB	Complete review and analysis of documents to be used in excerpts of record	2.00 95.00/hr	190.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
6/18/2014	- JC	Meeting with insured O. Taitz toward preparation of insured's opening brief and supporting excerpts of record in appeal from denial of anti-slapp motion to strike.	2.00 170.00/hr	340.00
	- PB	Begin draft of tables of authorities to opening brief in 9th circuit appeal	2.00 95.00/hr	190.00
	- JC	Continue preparation of insured's voluminous appendix of record on appeal supporting appeal from denial of anti-SLAPP motion to strike to amended complaint, pursuant to carrier authority.	1.10 170.00/hr	187.00
6/19/2014	- PB	Revise excerpts of volume 3 in support of opening brief.	1.00 95.00/hr	95.00
	- PB	Convert all 3 volumes of excerpts of record into mandatory OCR format	1.00 95.00/hr	NO CHARGE
	- JC	Continue review and analysis of issues regarding bankruptcy case of plaintiff, P. Berg, toward support for insured's potential motion to bar P. Berg from participating in appeal.	0.40 170.00/hr	68.00
	- PB	Revise excerpts of record volume 1 in support of opening brief.	1.50 95.00/hr	142.50
	- KS	Conference with client regarding appeal.	0.40 170.00/hr	68.00
	- PB	Revise excerpts of volume 2 in support of opening brief.	1.30 95.00/hr	123.50
	- PB	Bate stamp all volumes (858 pages) of excerpts of record in support of opening brief filed in 9th circuit appeal	0.40 95.00/hr	NO CHARGE
6/20/2014	- PB	Review opening brief and revise excerpts of record, volumes 1-3 based on same.	1.60 95.00/hr	152.00
	- PB	Draft certificate of service of opening brief and all three volumes to excerpts of record	0.20 95.00/hr	19.00
	- JC	Multiple telephone conferences insured (also as counsel for co-defendants) regarding preparation of voluminous record on appeal in insured's appeal, and in related appeal by co-defendant Defend Our Freedoms Foundation.	0.30 170.00/hr	51.00
	- PB	Edit and revise opening brief.	0.70 95.00/hr	66.50
	- PB	Continue draft of tables of authorities to opening brief in 9th circuit appeal	2.00 95.00/hr	190.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
6/20/2014	- PB	Draft table of contents to opening brief in 9th circuit appeal	0.80 95.00/hr	76.00
6/23/2014	- JC	Review multiple notices from court of appeals regarding filing of insured's opening brief and excerpts of record, and order to file paper copies of brief and excerpts.	0.40 170.00/hr	68.00
6/25/2014	- TD	Continue to analyze case law and statutes regarding bankruptcy debtor standing in appellate proceedings.	4.80 170.00/hr	816.00
6/26/2014	- TD	Analyze case law and federal bankruptcy law regarding chapter 13 bankruptcies and debtors' rights regarding causes of action	1.30 170.00/hr	221.00
	- TD	Analyze case law regarding trustee exclusive right to pursue cause of action as part of bankruptcy estate	1.80 170.00/hr	306.00
	- PB	3 x telephone calls to and from attorney services job for duplication and assembly of paper copies of opening brief and 3 volumes of excerpts of record in mandatory format required by federal court rules	0.30 95.00/hr	NO CHARGE
6/27/2014	- PB	Telephone call from 9th circuit court of appeal clerk, Lucie from Pasadena divisional office regarding paper submissions and receive instructions to redirect filings to San Francisco court	0.20 95.00/hr	19.00
6/30/2014	- PB	Review e-mail from 9th Circuit clerk regarding requirement for paper certificate	0.10 95.00/hr	9.50
	- PB	Prepare certificate for brief in paper format and submit directly to 9th circuit clerk by e-mail	0.20 95.00/hr	19.00
7/22/2014	- JC	Review updated docket regarding bankruptcy case of plaintiff and respondent, P. Berg, regarding potential use in insured's appeal from denial of anti-SLAPP motion to strike.	0.40 185.00/hr	74.00
7/29/2014	- TD	Review and analysis of Berg Bankruptcy status	0.50 170.00/hr	85.00
7/31/2014	- TD	Review and analyze Appeal documents and briefs filed thus far	1.10 170.00/hr	187.00
	- TD	Review Berg Chapter 13 bankruptcy and case law regarding his ability to represent himself in pending appeal.	0.80 170.00/hr	136.00
8/12/2014	- PB	Conference with attorney Jeffrey Cunningham regarding conversation with Appellate motions clerk regarding Plaintiff's answer to opening brief	0.10 95.00/hr	NO CHARGE
	- PB	Conference with attorney Jeffrey Cunningham regarding communication to Appellate Clerk regarding docket	0.20 95.00/hr	NO CHARGE

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/12/2014	- JC	Multiple correspondence with insured regarding status of bankruptcy of respondent P. Berg and potential effect on insured's appeal, and regarding inclusion of legal arguments requested by insured in reply brief in appeal.	0.40 185.00/hr	74.00
	- JC	Telephone conference with court clerk regarding potential motion to bar respondents from participating in appeal due to tardy brief, in appeal by insured.	0.30 185.00/hr	55.50
	- JC	Attorney analysis of complex legal issues regarding effect of plaintiffs' failure to file opening brief in insured's appeal, including potential motion to bar filing of brief and participation in oral argument, and including potential motion for sanctions.	0.90 185.00/hr	166.50
	- PB	Telephone conference with Appellate motions clerk regarding Plaintiff's answer to opening brief	0.10 95.00/hr	9.50
8/13/2014	- JC	Begin review and analysis of plaintiffs Liberi, Ostella and Go Excel Globals' lengthy answering brief (over 60 pages) and supplemental excerpts of record (approximately 2,000 pages) in insured's appeal, toward preparation of insured's reply brief and pursuant to carrier approval.	3.90 185.00/hr	721.50
	- JC	Begin review and analysis of respondents' extension documents in related appeal by Defend Our Freedoms Foundations, toward support for potential motion to strike respondents' brief in insured's appeal.	0.70 185.00/hr	129.50
	- KS	Conference regarding opposing counsel's answering brief, filed untimely.	0.40 185.00/hr	74.00
	- KS	Conference regarding strategy and handling of client's request that we file a motion to strike.	0.40 185.00/hr	74.00
	- JC	Multiple correspondence and telephone conferences with insured regarding potential extension order for plaintiffs in insured's appeals, and toward preparation of potential motion to strike respondents' answering brief.	0.60 185.00/hr	111.00
	- KS	Correspondence with carrier regarding appellate issues.	0.20 185.00/hr	37.00
8/14/2014	- JC	Begin review and analysis of motion for leave to file late brief by respondents Liberi, Ostella and Go Excel Global in appeal by insured, toward preparation of opposition to motion.	0.90 185.00/hr	166.50
	- JC	Multiple correspondence with insured regarding motion for leave to file late brief by respondents Liberi, Ostella and Go Excel Global in appeal by insured, toward preparation of opposition to motion.	0.30 185.00/hr	55.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/14/2014	- JC	Begin preparation of insured's opposition to motion for leave to file late brief by respondents Liberi, Ostella and Go Excel Global in appeal by insured.	1.10 185.00/hr	203.50
	- JC	Begin review and analysis of respondents' answering brief (approximately 60 pages) in appeal of Defendant, Defend Our Freedoms Foundations (represented by insured, O. Taitz), related to appeal by insured from denial of anti-SLAPP motion to strike.	2.10 185.00/hr	388.50
	- JC	Multiple correspondence with court of appeal regarding motion for leave to file late brief by respondents Liberi, Ostella and Go Excel Global in appeal by insured, and effect on briefing schedule in case.	0.40 185.00/hr	74.00
	- JC	Several conferences with insured regarding development of legal arguments for reply brief in insured's appeal, and in opposition to respondents' answering brief in appeal.	0.50 185.00/hr	92.50
	- KS	Finalize update to carrier regarding new motion.	0.20 185.00/hr	37.00
	- JC	Continue review and analysis of plaintiffs Liberi, Ostella and Go Excel Globals' lengthy answering brief (over 60 pages) and supplemental excerpts of record (approximately 2,000 pages) in insured's appeal, toward preparation of insured's reply brief and pursuant to carrier approval.	5.10 185.00/hr	943.50
	- KS	Correspondence with client regarding new developments on appeal.	0.30 185.00/hr	55.50
	- KS	Strategy conference regarding handling of new appellate issues.	0.80 185.00/hr	148.00
8/15/2014	- JC	Draft attorney update and analysis for carrier regarding appellee's motion to file late brief in appeal of insured, with future handling plan for opposition to motion.	0.40 185.00/hr	74.00
	- JC	Continue preparation of insured's opposition to motion for leave to file late brief by respondents Liberi, Ostella and Go Excel Global in appeal by insured.	2.80 185.00/hr	518.00
	- JC	Correspondence with insured regarding preparation of opposition to motion for leave to file late brief by respondents Liberi, Ostella and Go Excel Global in appeal by insured.	0.20 185.00/hr	37.00
8/16/2014	- JC	Continue preparation of insured's opposition to motion for leave to file late brief by respondents Liberi, Ostella and Go Excel Global in appeal by insured, incorporating revisions by insured.	1.90 185.00/hr	351.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/16/2014 -	JC	Multiple correspondence with insured regarding revisions to insured's opposition to motion for leave to file late brief by respondents Liberi, Ostella and Go Excel Global in appeal by insured.	0.40 185.00/hr	74.00
-	JC	Continue review and analysis of plaintiffs Liberi, Ostella and Go Excel Globals' lengthy answering brief (over 60 pages) and supplemental excerpts of record (approximately 2,000 pages) in insured's appeal, toward preparation of insured's reply brief and pursuant to carrier approval.	4.80 185.00/hr	888.00
8/17/2014 -	KS	Conference regarding client's demands that we amend our response.	0.60 185.00/hr	111.00
8/18/2014 -	TD	Analyze Appeal of Taitz and compare to Responsive Pleading of Liberi (Late) regarding citations used. Create chart to compare what cases and statutes were shared between the parties and which were used exclusively.	3.50 170.00/hr	595.00
-	JC	Continue review and analysis of respondents' answering brief (approximately 60 pages) in appeal of Defendant, Defend Our Freedoms Foundations (represented by insured, O. Taitz), related to appeal by insured from denial of anti-SLAPP motion to strike.	2.80 185.00/hr	518.00
-	JC	Review and analysis of order transferring related Liberi v. IRB case to Florida district court.	0.40 185.00/hr	74.00
-	JC	Begin drafting insured's motion to reconsider and vacate order allowing late answering brief by appellees Liberi, Ostella and Go Excel Global.	1.40 185.00/hr	259.00
-	JC	Continue review and analysis of plaintiffs Liberi, Ostella and Go Excel Globals' lengthy answering brief (over 60 pages) and supplemental excerpts of record (approximately 2,000 pages) in insured's appeal, toward preparation of insured's reply brief and pursuant to carrier approval.	2.90 185.00/hr	536.50
-	JC	Review and analysis of order on appellees' motion for leave to file late brief.	0.30 185.00/hr	55.50
-	JC	Multiple correspondence with insured regarding evaluation of court of appeals' order on appellees' motion for leave to file late brief, and potential motion to reconsider and vacate order.	0.30 185.00/hr	55.50
-	KS	Conference regarding client's motion for reconsideration.	0.30 185.00/hr	55.50
8/19/2014 -	JC	Review court of appeals rules and other authorities regarding potential disqualification of counsel for certain appellees, on request by insured for inclusion in motion to reconsider and vacate order allowing late filing of appellees' answering brief.	0.80 185.00/hr	148.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/19/2014	- JC	Several telephone conferences and correspondence with insured regarding potential disqualification of counsel for certain appellees, on request by insured for inclusion in motion to reconsider and vacate order allowing late filing of appellees' answering brief.	0.80 185.00/hr	148.00
	- JC	Begin review and analysis of ninth circuit rules regarding insured's potential motion to challenge motions panel in her appeal.	0.60 185.00/hr	111.00
	- JC	Continue drafting insured's motion to reconsider and vacate order allowing late answering brief by appellees Liberi, Ostella and Go Excel Global, with several revisions and additions requested by insured.	2.30 185.00/hr	425.50
	- JC	Continue review and analysis of plaintiffs Liberi, Ostella and Go Excel Globals' lengthy answering brief (over 60 pages) and supplemental excerpts of record (approximately 2,000 pages) in insured's appeal, toward preparation of insured's reply brief and pursuant to carrier approval.	4.10 185.00/hr	758.50
8/20/2014	- PB	Finalize motion for reconsideration on clerk's order	0.30 95.00/hr	28.50
	- JC	Continue review and analysis of respondents' answering brief (approximately 60 pages) in appeal of Defendant, Defend Our Freedoms Foundations (represented by insured, O. Taitz), related to appeal by insured from denial of anti-SLAPP motion to strike.	2.10 185.00/hr	388.50
	- PB	Prepare certification of ECF service of motion for reconsideration on clerk's order	0.20 95.00/hr	19.00
	- KS	Conference with client regarding strategy for our response.	0.60 185.00/hr	111.00
	- KS	Examine client's request for new panel of judges/ clerks to review her filings.	2.20 185.00/hr	407.00
8/21/2014	- JC	Begin review and analysis of plaintiffs' Memorandum of Points and Authorities in opposition to insured's motion for reconsideration of order allowing plaintiffs' late brief and excerpts in insured's appeal, and to strike brief and excerpts, toward preparation of reply Memorandum of Points and Authorities.	0.80 185.00/hr	148.00
	- JC	Begin review and analysis of complex legal issues raised in appellees' brief regarding potential effect of transfer of case on jurisdiction for anti-SLAPP motion to strike, toward preparation of insured's arguments in reply brief in appeal.	3.80 185.00/hr	703.00
	- KS	Further conference regarding client's multiple requests related to her appeal and the court's most recent ruling.	0.80 185.00/hr	148.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/21/2014	- KS	Examine new cases cited by the client for relevance and applicability.	1.20 185.00/hr	222.00
	- JC	Continue review and analysis of plaintiffs Liberi, Ostella and Go Excel Globals' lengthy answering brief (over 60 pages) and supplemental excerpts of record (approximately 2,000 pages) in insured's appeal, toward preparation of insured's reply brief and pursuant to carrier approval.	1.50 185.00/hr	277.50
8/22/2014	- JC	Draft update and attorney analysis regarding insured's appeal, including motion for reconsideration and to set aside order regarding appellees' late answering brief.	0.30 185.00/hr	55.50
8/23/2014	- JC	Begin drafting insured's reply Memorandum of Points and Authorities regarding motion for reconsideration of order granting appellees' motion to file late brief, in insured's appeal.	0.70 185.00/hr	129.50
	- JC	Continue review and analysis of plaintiffs Liberi, Ostella and Go Excel Globals' lengthy answering brief (over 60 pages) and supplemental excerpts of record (approximately 2,000 pages) in insured's appeal, toward preparation of insured's reply brief and pursuant to carrier approval.	4.90 185.00/hr	906.50
8/24/2014	- KS	Finalize update to carrier regarding recent developments.	0.40 185.00/hr	74.00
8/25/2014	- JC	Continue review and analysis of respondents' answering brief (approximately 60 pages) in appeal of Defendant, Defend Our Freedoms Foundations (represented by insured, O. Taitz), related to appeal by insured from denial of anti-SLAPP motion to strike.	1.10 185.00/hr	203.50
	- JC	Begin drafting of insured's reply brief in appeal from denial of anti-SLAPP motion to strike, pursuant to carrier authorization.	1.60 185.00/hr	296.00
	- JC	Continue drafting insured's reply Memorandum of Points and Authorities regarding motion for reconsideration of order granting appellees' motion to file late brief, in insured's appeal.	1.90 185.00/hr	351.50
	- JC	Continue review and analysis of plaintiffs Liberi, Ostella and Go Excel Globals' lengthy answering brief (over 60 pages) and supplemental excerpts of record (approximately 2,000 pages) in insured's appeal, toward preparation of insured's reply brief and pursuant to carrier approval.	3.80 185.00/hr	703.00
8/26/2014	- PB	Finalize reply to opposition to motion for reconsideration on clerk's order	0.30 95.00/hr	28.50
	- JC	Multiple correspondence with insured regarding revisions to insured's reply Memorandum of Points and Authorities regarding motion for reconsideration of order granting appellees' motion to file late brief, in insured's appeal.	0.30 185.00/hr	55.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/26/2014	- JC	Continue drafting insured's reply Memorandum of Points and Authorities regarding motion for reconsideration of order granting appellees' motion to file late brief, in insured's appeal.	0.40 185.00/hr	74.00
	- PB	Prepare certification of ECF service on reply to opposition to motion for reconsideration on clerk's order	0.20 95.00/hr	19.00
	- JC	Continue review and analysis of plaintiffs Liberi, Ostella and Go Excel Globals' lengthy answering brief (over 60 pages) and supplemental excerpts of record (approximately 2,000 pages) in insured's appeal, toward preparation of insured's reply brief and pursuant to carrier approval.	2.70 185.00/hr	499.50
8/27/2014	- TD	Review Berg bankruptcy action in Pennsylvania Eastern	0.60 170.00/hr	102.00
	- JC	Continue drafting of insured's reply brief in appeal from denial of anti-SLAPP motion to strike, pursuant to carrier authorization.	0.90 185.00/hr	166.50
8/28/2014	- JC	Continue review and analysis of plaintiffs Liberi, Ostella and Go Excel Globals' lengthy answering brief (over 60 pages) and supplemental excerpts of record (approximately 2,000 pages) in insured's appeal, toward preparation of insured's reply brief and pursuant to carrier approval.	1.40 185.00/hr	259.00
8/29/2014	- JC	Continue drafting of insured's reply brief in appeal from denial of anti-SLAPP motion to strike, pursuant to carrier authorization.	2.50 185.00/hr	462.50
	- JC	Continue review and analysis of plaintiffs Liberi, Ostella and Go Excel Globals' lengthy answering brief (over 60 pages) and supplemental excerpts of record (approximately 2,000 pages) in insured's appeal, toward preparation of insured's reply brief and pursuant to carrier approval.	1.30 185.00/hr	240.50
8/30/2014	- JC	Continue drafting of insured's reply brief in appeal from denial of anti-SLAPP motion to strike, pursuant to carrier authorization.	3.20 185.00/hr	592.00
9/2/2014	- JC	Multiple correspondence with insured regarding development of legal argument on transfer based issues, in appeal from denial of insured's anti-SLAPP motion.	0.30 185.00/hr	55.50
9/3/2014	- PB	Review and analyze Pennsylvania filings for use in reply brief and request for judicial notice for appellate action	0.60 95.00/hr	57.00
	- JC	Continue drafting of insured's reply brief in appeal from denial of anti-SLAPP motion to strike, pursuant to carrier authorization.	2.80 185.00/hr	518.00
	- JC	Begin review and analysis of motion and orders regarding insured's motion to dismiss regarding lack of jurisdiction in Pennsylvania district court, toward support for preparation of request for judicial notice in insured's appeal and development of	0.60 185.00/hr	111.00



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		<u>Hrs/Rate</u>	<u>Amount</u>
	insured's counter-arguments on new issues raised by plaintiffs in appeal regarding Pennsylvania substantive law.		
9/4/2014 - JC	Lengthy conference with insured, also as counsel for co-defendant, Defend Our Freedoms Foundations, toward preparation of reply brief arguments in insured's and DOFF's appeals.	0.80 185.00/hr	148.00
- TD	Analyze Anti-SLAPP Motion and 9th Circuit Briefs for purpose of reply brief.	2.30 170.00/hr	391.00
- JC	Review court of appeal's order on insured's motion for reconsideration of granting of leave to respondents to file late brief and excerpts of record, in insured's appeal from denial of anti-SLAPP motion to strike, pursuant to carrier authorization.	0.40 185.00/hr	74.00
9/5/2014 - JC	Multiple conferences with insured, also as counsel for co-defendant, toward preparation of insured's reply brief in appeal from denial of anti-SLAPP motion to strike, pursuant to carrier authorization.	0.40 185.00/hr	74.00
- JC	Continue drafting of insured's reply brief in appeal from denial of anti-SLAPP motion to strike, pursuant to carrier authorization.	2.30 185.00/hr	425.50
9/8/2014 - JC	Continue drafting of insured's reply brief in appeal from denial of anti-SLAPP motion to strike, pursuant to carrier authorization.	4.80 185.00/hr	888.00
- JC	Multiple conferences with insured, also as counsel for co-defendant, toward preparation of insured's reply brief in appeal from denial of anti-SLAPP motion to strike, pursuant to carrier authorization.	0.40 185.00/hr	74.00
9/9/2014 - JC	Begin drafting of insured's request for judicial notice, with supporting declaration and exhibits, in appeal from denial of anti-SLAPP motion to strike, pursuant to carrier approval.	1.40 185.00/hr	259.00
- JC	Multiple telephone conference with insured, also as counsel for defendant, Defend Our Freedoms Foundations, regarding preparation and development of insured's reply brief in appeal.	0.30 185.00/hr	55.50
- KS	Conference regarding DOFF reply brief.	0.40 185.00/hr	74.00
- KS	Correspondence from client regarding falsified records filed by plaintiff and conference regarding same.	0.80 185.00/hr	148.00
9/10/2014 - JC	Begin drafting of insured's motion to consolidate appeals, with supporting declaration and exhibits, in appeal from denial of anti-SLAPP motion to strike, pursuant to carrier approval.	1.50 185.00/hr	277.50



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			<u>Hrs/Rate</u>	<u>Amount</u>
9/10/2014	- JC	Continue drafting of insured's request for judicial notice, with supporting declaration and exhibits, in appeal from denial of anti-SLAPP motion to strike, pursuant to carrier approval.	1.90 185.00/hr	351.50
9/11/2014	-	[REDACTED]		
	- JC	Begin review and analysis of insured's lengthy correspondence and record on appeal materials, regarding potential motion for sanctions in insured's appeal regarding alteration of documents in respondents' supplemental excerpts of record.	0.70 185.00/hr	129.50
	- JC	Continue drafting of insured's motion to consolidate appeals, with supporting declaration and exhibits, in appeal from denial of anti-SLAPP motion to strike, pursuant to carrier approval.	1.60 185.00/hr	296.00
	- JC	Multiple correspondence with insured, also as counsel for defendant, Defend Our Freedoms Foundations, regarding preparation and development of insured's reply brief in appeal.	0.40 185.00/hr	74.00
9/12/2014	- JC	Multiple telephone conferences with insured, also as counsel for defendant, Defend Our Freedoms Foundations, regarding preparation and development of insured's reply brief and motion to consolidate in appeal.	0.40 185.00/hr	74.00
	- PB	Draft tables of contents and authorities to reply brief submitted on behalf of client Orly Taitz	2.80 95.00/hr	266.00
	- KS	Conference regarding changes to briefs.	0.30 185.00/hr	55.50
	- PB	Review and finalize request for judicial notice in support of reply brief submitted on behalf of client, Orly Taitz	1.00 95.00/hr	95.00
	- PB	Review and finalize Motion to Consolidate Defend Our Freedoms Foundation Appeal with Orly Taitz Appeal	0.80 95.00/hr	76.00
	- PB	Review and finalize Reply Brief filed on behalf of Orly Taitz	1.00 95.00/hr	95.00
9/18/2014	- KS	Notice from court regarding consolidation.	0.30 185.00/hr	55.50
9/19/2014	- PB	Prepare submission of paper filing of reply brief pursuant to Court Order	2.00 95.00/hr	190.00
	- PB	Draft Certificate for Brief in Paper Format submission for paper filing submission	0.30 95.00/hr	28.50
9/24/2014	- KS	Finalize detailed update to carrier.	0.60 185.00/hr	111.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/30/2014	- JC	Review lengthy, over 40 pages, reply brief of defendant, Defend Our Freedoms Foundation, in appeal related to and consolidated with appeal by insured from denial of anti-SLAPP motion to strike.	1.80 185.00/hr	333.00
10/8/2014	- JC	Review notice of court of appeals regarding filing of reply brief of co-appellant, Defend Our Freedoms Foundations, regarding related appeal of insured, O. Taitz.	0.30 185.00/hr	55.50
10/9/2014	- KS	Notice from court of appeals regarding filing.	0.30 185.00/hr	55.50
10/14/2014	- KS	Meeting with carrier regarding status and future handling strategy.	0.80 185.00/hr	148.00
10/28/2014	- KS	Conference with JPC regarding court's order.	0.40 185.00/hr	74.00
	- PB	Review e-filing notification and closing minutes from 9th Circuit	0.10 95.00/hr	9.50
	- JC	Review and analysis of notice of district court, preliminarily closing case pending appeal by insured from denial of anti-SLAPP motion to strike.	0.40 185.00/hr	74.00
10/29/2014	- JC	Multiple correspondence with insured regarding filing of order in District Court case closing case as to previously dismissed defendants.	0.30 185.00/hr	55.50
	- JC	Review and analysis of updated lengthy dockets in consolidated appeals by insured, O. Taitz, and defendant, Defend Our Freedoms Foundations, from denial of insured's anti-SLAPP motion to strike.	0.50 185.00/hr	92.50
	- PB	Review appellate docket regarding closing minutes	0.10 95.00/hr	9.50
12/5/2014	- JY	Review and analyze records for status update to client.	0.10 95.00/hr	9.50
12/8/2014	- JC	Multiple telephone conferences with insured regarding motion by plaintiff, L. Ostella in related Ostella v. IRB case, for removal of counsel in case, and insured's proposed Rule 11 sanctions motion in appeal.	0.30 185.00/hr	55.50
	- JC	Review and analysis of motion by plaintiff, L. Ostella in related Ostella v. IRB case, for removal of counsel in case.	0.40 185.00/hr	74.00
12/10/2014	- JC	Begin evaluation of complex issues regarding insured's proposed Rule 11 sanctions motion in appeal.	0.90 185.00/hr	166.50
12/12/2014	- KS	Correspondence with client regarding filing of her own cross-complaint. Conference regarding same.	0.80 185.00/hr	148.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/12/2014	- KS	Correspondence with carrier regarding future new litigation.	0.20 185.00/hr	37.00
	- JC	Begin review and analysis of voluminous supplemental record of appeal by plaintiffs in insured's appeal, toward support for insured's proposed Rule 11 sanctions motion in appeal.	0.90 185.00/hr	166.50
12/13/2014	- KS	Conference regarding handling of client's future handling request.	0.30 185.00/hr	55.50
	- KS	Correspondence from client regarding status.	0.20 185.00/hr	37.00
12/15/2014	- JC	Begin review and analysis of voluminous file materials including record on appeal in insured's appeals, toward drafting correspondence to opposing counsel regarding notice of intent to seek sanctions regarding plaintiff, L. Liberi.	1.20 185.00/hr	222.00
	- JC	Multiple telephone conferences with insured regarding insured's proposed Rule 11 sanctions motion in appeal.	0.30 185.00/hr	55.50
	- KS	Telephone conference with J Cunningham regarding client's demand for Rule 11 letter to opposing counsel.	0.40 185.00/hr	74.00
12/16/2014	- JC	Begin drafting correspondence to opposing counsel regarding notice of intent to seek sanctions regarding plaintiff, L. Liberi.	0.60 185.00/hr	111.00
	- JC	Continue review and analysis of voluminous file materials including record on appeal in insured's appeals, toward drafting correspondence to opposing counsel regarding notice of intent to seek sanctions regarding plaintiff, L. Liberi.	1.00 185.00/hr	185.00
12/17/2014	- JC	Multiple correspondence with insured regarding insured's revisions to correspondence to opposing counsel regarding notice of intent to seek sanctions regarding plaintiff, L. Liberi.	0.30 185.00/hr	55.50
	- JC	Continue drafting correspondence to opposing counsel regarding notice of intent to seek sanctions regarding plaintiff, L. Liberi.	1.10 185.00/hr	203.50
12/18/2014	- JC	Perform, review and analyze Lexis Nexis searches regarding plaintiff, L. Liberi including for Social Security information, toward support for insured's notice of intent to seek sanctions regarding plaintiff, L. Liberi.	0.90 185.00/hr	166.50
	- JC	Begin review and analysis of voluminous appellees' supplemental excerpts of record, and related voluminous exhibits to first amended complaint, and related orders of district court, toward preparation of potential motion to strike supplemental excerpts of record.	1.10 185.00/hr	203.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/18/2014	- JC	Multiple telephone conferences with insured regarding development of potential cross-claim in federal court case against plaintiffs.	0.30 185.00/hr	55.50
	- JC	Review and analysis of newly provided pleadings regarding 2001 bankruptcy case of plaintiff, L. Liberi, toward preparation of insured's notice to opposing counsel of intention to seek sanctions regarding Liberi claims regarding publication of social security numbers.	0.70 185.00/hr	129.50
	- JC	Continue review and analysis of voluminous file materials including record on appeal in insured's appeals, toward drafting correspondence to opposing counsel regarding notice of intent to seek sanctions regarding plaintiff, L. Liberi.	2.50 185.00/hr	462.50
	- JC	Continue drafting detailed correspondence to opposing counsel with revisions requested by insured, regarding notice of intent to seek sanctions regarding plaintiff, L. Liberi.	1.10 185.00/hr	203.50
12/19/2014	- KS	Correspondence with client regarding Liberi's bankruptcy and use of public information.	0.50 185.00/hr	92.50
	- JC	Several correspondence and telephone conference with insured O. Taitz (also as counsel for several defendants) regarding insured's requested revisions to correspondence to opposing counsel regarding notice of intent to seek sanctions regarding plaintiff, L. Liberi.	0.80 185.00/hr	148.00
	- CAB	Review, revise and finalize correspondence to opposing counsel Marcus regarding Notice of Intention to Seek Sanctions	0.30 95.00/hr	28.50
	- JC	Perform, review and analyze Lexis Nexis searches regarding plaintiff, L. Liberi including for Social Security information, toward support for insured's notice of intent to seek sanctions regarding plaintiff, L. Liberi.	0.40 185.00/hr	74.00
	- JC	Continue drafting detailed correspondence to opposing counsel with further revisions requested by insured, regarding notice of intent to seek sanctions regarding plaintiff, L. Liberi.	0.50 185.00/hr	92.50
12/21/2014	-			
12/22/2014	- JC	Begin review and analysis of portions of voluminous record on appeal including several orders of District Court identified by insured, O. Taitz, also as counsel for co-appellants, toward preparation for oral argument in appeals on Communications Decency Act and res judicata grounds.	0.90 185.00/hr	166.50
12/23/2014	- JC	Continue review and analysis of portions of voluminous record on appeal including several orders of District Court identified by insured, O. Taitz, also as counsel for co-appellants, toward	0.80 185.00/hr	148.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
		preparation for oral argument in appeals on Communications Decency Act and res judicata grounds.		
12/26/2014	- JC	Multiple correspondence with insured regarding support for insured's collateral estoppel arguments in preparation for oral argument in insured's appeal.	0.30 185.00/hr	55.50
12/27/2014	- KS	Conference regarding client's cross-complaint.	0.40 185.00/hr	74.00
	- JC	Multiple correspondence with insured toward preparation of insured's cross-complaint in district court case,	0.30 185.00/hr	55.50
12/29/2014	- JC	Begin review and analysis of lengthy and complex proposed cross-complaint (approximately 65 pages) prepared by insured, O. Taitz (also as counsel for co-defendants), toward revisions to pleading and potential filing in district court case.	0.90 185.00/hr	166.50
	- JC	Begin drafting comprehensive update with attorney analysis for carrier regarding status of appeals, insured's proposed motion for sanctions, insured's proposed cross-complaint, and related future handling plan.	0.90 185.00/hr	166.50
	- KS	Correspondence with client regarding plaintiff's admitted fraud.	0.30 185.00/hr	55.50
12/30/2014	- JC	Multiple correspondence with insured regarding evaluation of potential cross-complaint.	0.30 185.00/hr	55.50
	- KS	Conference regarding motion for sanctions and possible cross-complaint.	0.50 185.00/hr	92.50
12/31/2014	- KS	Conference regarding motion for sanctions.	0.30 185.00/hr	55.50
	- JC	Continue review and analysis of lengthy and complex proposed cross-complaint (approximately 65 pages) prepared by insured, O. Taitz (also as counsel for co-defendants), toward revisions to pleading and potential filing in district court case.	0.70 185.00/hr	129.50
1/5/2015	- JC	Continue review and analysis of insured's lengthy proposed cross-complaint (over 60 pages), toward preparation of insured's counterclaim, cross-claim and third party complaint in district court case.	1.10 185.00/hr	203.50
1/7/2015	- CAB	Receipt and review correspondence from Plaintiff in response to our 12/19/14 correspondence	0.10 95.00/hr	9.50
1/9/2015	- JC	Continue review and analysis of insured's lengthy proposed cross-complaint (over 60 pages), toward preparation of insured's counterclaim, cross-claim and third party complaint in district court case.	0.80 185.00/hr	148.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/9/2015 -	JC	Multiple correspondence with insured (also as counsel for co-defendants) regarding development of insured's proposed sanctions motion.	0.30 185.00/hr	55.50
1/12/2015 -	KS	Conference with carrier regarding future handling and discovery plan.	0.20 185.00/hr	37.00
1/13/2015 -	JC	Multiple correspondence with insured, O. Taitz, and review of file materials provided by insured, toward preparation of response to opposing counsel regarding insured's notice of intent to seek sanctions in district court and court of appeals' cases.	1.60 185.00/hr	296.00
1/14/2015 -	JC	Continue review and analysis of insured's lengthy proposed cross-complaint (over 60 pages), toward preparation of insured's counterclaim, cross-claim and third party complaint in district court case.	1.50 185.00/hr	277.50
-	KS	Begin work on future handling plan and budget for carrier.	0.70 185.00/hr	129.50
-	JC	Multiple correspondence with insured, O. Taitz, and review of file materials provided by insured, regarding defamation and invasion of privacy claims by plaintiff L. Liberi based on Social Security Number, and toward preparation of response to opposing counsel regarding insured's notice of intent to seek sanctions in district court and court of appeals' cases.	0.90 185.00/hr	166.50
1/15/2015 -	JC	Begin drafting detailed supplemental notice of intention to seek sanctions.	0.60 185.00/hr	111.00
1/16/2015 -	JC	Continue drafting detailed supplemental notice of intention to seek sanctions and related correspondence with insured regarding preparation of notice.	0.70 185.00/hr	129.50
1/19/2015 -	JC	Review summary and analysis by insured regarding potential cross-complaint by insured against plaintiffs and counsel including for fraud and RICO claims, and evidence for cross-complaint, regarding altered evidence.	0.60 185.00/hr	111.00
-	JC	Review and analysis of voluminous file materials in district court and court of appeals cases regarding plaintiffs' falsification of evidence, toward support for notification of intent to seek sanctions and potential sanctions motion.	0.90 185.00/hr	166.50
1/21/2015 -	JC	Multiple telephone conferences with insured regarding development of potential cross-complaint by insured against plaintiffs and counsel including for fraud and RICO claims, and evidence for cross-complaint, regarding altered evidence.	0.30 185.00/hr	55.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/21/2015 - JC	Continue analysis regarding potential cross-complaint by insured against plaintiffs and counsel including for fraud and RICO claims, and evidence for cross-complaint, regarding altered evidence.		0.70 185.00/hr	129.50
1/22/2015 - JC	Continue review and analysis of voluminous file materials in district court and court of appeals cases regarding plaintiffs' falsification of evidence, toward support for notification of intent to seek sanctions and potential sanctions motion.		0.70 185.00/hr	129.50
1/23/2015 - JC	Begin drafting comprehensive correspondence to opposing counsel regarding plaintiffs' falsification of evidence and further notification of intent to seek sanctions and potential sanctions motion.		0.80 185.00/hr	148.00
1/26/2015 - JC	Continue review and analysis of voluminous file materials in district court and court of appeals cases regarding plaintiffs' falsification of evidence, toward support for notification of intent to seek sanctions and potential sanctions motion.		1.50 185.00/hr	277.50
- JC	Continue drafting comprehensive correspondence to opposing counsel regarding plaintiffs' falsification of evidence and further notification of intent to seek sanctions and potential sanctions motion.		0.90 185.00/hr	166.50
1/30/2015 - JC	Several conferences with insured regarding development of cross-claim, counter-claim and third party complaint vs. plaintiffs and numerous non-parties.		0.50 185.00/hr	92.50
2/2/2015 - JC	Continue analysis of potential claims including federal RICO claims proposed by insured (also as counsel for co-defendants) toward development of potential counterclaim, cross claim and third party complaint.		1.40 185.00/hr	259.00
- JC	Multiple telephone conferences with insured (also as counsel for co-defendants) toward preparation of detailed correspondence to opposing counsel regarding potential motion for sanctions in district court and court of appeals.		0.30 185.00/hr	55.50
2/3/2015 - JC	Continue preparation of detailed correspondence to opposing counsel regarding insured's potential motion for sanctions in district court and court of appeals, incorporating revisions of insured (also as counsel for co-defendants) and references to additional evidence provided by insured supporting notice.		2.10 185.00/hr	388.50
2/4/2015 - KS	Conference with J Cunningham regarding Markus letter, declaration of Berg, etc.		0.60 185.00/hr	111.00
- KS	Examination of evidence received from client.		3.40 185.00/hr	629.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
2/5/2015	- KS	Work on changes to Markus demand.	0.40 185.00/hr	74.00
2/6/2015	- JC	Multiple and lengthy conferences with insured (also as counsel for co-defendants), toward development of insured's motion for sanctions against plaintiffs and counsel.	0.80 185.00/hr	148.00
2/9/2015	- JC	Draft comprehensive update and analysis for carrier regarding status of insured's appeal and insured's proposed motion for sanctions in court of appeal.	0.40 185.00/hr	74.00
2/12/2015	- KS	Work on response to client regarding demand for sanctions.	0.60 185.00/hr	111.00
2/13/2015	- KS	Correspondence with carrier regarding motion for sanctions.	0.50 185.00/hr	92.50
	- KS	Telephone conference with carrier regarding motion for sanctions.	0.30 185.00/hr	55.50
2/16/2015	- JC	Review and analysis of California's "Safe at Home" Program materials regarding allegations of plaintiff, L. Liberi, regarding placement in program, insured's publication of alleged information regarding placement, and including Liberi allegations regarding publication regarding social security number in connection with program placement.	0.90 185.00/hr	166.50
2/17/2015	- JC	Begin review and analysis of fraud jury instructions and related materials regarding development of fraud based claims in counter-claim and third party complaint, as requested by insured O. Taitz, and toward preparation of future handling plan with insured (also as counsel for several co-defendants) for prosecution of counter-claims, cross-claims and third party complaints.	1.40 185.00/hr	259.00
2/18/2015	- JC	Multiple correspondence with insured regarding preparation of proposed detailed counterclaim, cross claim and third party complaint.	0.30 185.00/hr	55.50
2/24/2015	- JC	Multiple correspondence with insured and M. Colen, counsel for former defendant N. Sankey, regarding upcoming deposition of Sankey in related Ostella case.	0.30 185.00/hr	55.50
2/25/2015	- JC	Conduct meeting with insured, O. Taitz, regarding preparation and revisions to correspondence to opposing counsel regarding sanctions, regarding deposition of former defendant N. Sankey in related Ostella case, and toward drafting of insured's counter-claim and third party complaint.	3.30 185.00/hr	610.50
	- JC	Draft several revisions to detailed notice to opposing counsel regarding intent to seek sanctions, following meeting with insured, O. Taitz, regarding revisions to notice regarding	1.10 185.00/hr	203.50



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			<u>Hrs/Rate</u>	<u>Amount</u>
		sanctions, and related review of voluminous file materials supporting insured's revisions to notice.		
2/26/2015	- JC	Begin analysis of potential probation violations by plaintiff L. Liberi, toward evaluation of potential motion or application proposed by insured O. Taitz regarding violation of probation.	0.50 185.00/hr	92.50
2/27/2015	- CAB	Complete correspondence to opposing counsel Stephen Marcus responding to 12/31/14 correspondence and providing further notice of the intention of Defendant/Appellant, Orly Taitz to seek sanctions	0.20 95.00/hr	19.00
	- JC	Continue analysis of potential probation violations by plaintiff L. Liberi, toward evaluation of potential motion or application proposed by insured O. Taitz regarding violation of probation.	0.30 185.00/hr	55.50
	- JC	Draft several revisions to detailed notice to opposing counsel regarding intent to seek sanctions, following numerous revisions and additions requested by insured, O. Taitz, and related review of voluminous file materials supporting insured's revisions and additions to notice.	2.10 185.00/hr	388.50
	- CAB	Complete correspondence to opposing counsel George Gittler and Scott Bradford responding to 12/31/14 correspondence and providing further notice of the intention of Defendant/Appellant, Orly Taitz to seek sanctions	0.20 95.00/hr	19.00
	- CAB	Complete correspondence to opposing counsel Randy Berg responding to 12/31/14 correspondence and providing further notice of the intention of Defendant/Appellant, Orly Taitz to seek sanctions	0.20 95.00/hr	19.00
3/2/2015	- JC	Drafting of insured, O. Taitz's detailed and lengthy proposed counter-claim.	1.60 185.00/hr	296.00
3/3/2015	-			
	- CAB	Prepare letters to counsel Gittler, Bradford, Marcus and Berg pursuant to carrier request	0.30 95.00/hr	28.50
	- KS	Correspondence with client regarding "Marcus Letter"	0.20 185.00/hr	37.00
3/4/2015	- JC	Multiple telephone conference with insured, O. Taitz (also as counsel for co-defendants), regarding preparation of counter-claims and third party complaints.	0.30 185.00/hr	55.50
	- JC	Drafting of insured, O. Taitz's detailed and lengthy proposed counter-claim.	3.20 185.00/hr	592.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/4/2015 -	[REDACTED]			
3/5/2015 -	[REDACTED]			
-	CAB	Track and print out FedEx delivery confirmation concerning letters to Gittler and Bradford pursuant to Jeff Cunningham request	0.10 95.00/hr	NO CHARGE
-	JC	Review and analysis of California Secretary of State materials regarding entity status of defendant, Defend Our Freedoms Foundation, toward preparation of insured's counter-claim and third party complaint.	0.40 185.00/hr	74.00
3/6/2015 -	JC	Communicate with P Batiller regarding technical language and distinctions between terms "blog", "website", "domain names" and "domains"	0.80 185.00/hr	148.00
3/9/2015 -	CAB	Receipt and review correspondence from Gittler & Bradford responding to our 3/4/15 letter	0.10 95.00/hr	9.50
3/11/2015 -	JC	Continue drafting of insured's complex proposed counter-claim in federal court case.	3.50 185.00/hr	647.50
-	KS	Conference with J Cunningham regarding client's new evidence related to Liberi's false statements in Federal Court, August 2009.	0.40 185.00/hr	74.00
-	KS	Correspondence from client regarding meeting.	0.20 185.00/hr	NO CHARGE
3/12/2015 -	KS	Correspondence with client regarding future handling of her requests.	0.30 185.00/hr	55.50
-	JC	Multiple correspondence with insured regarding preparation of counter-claim.	0.30 185.00/hr	55.50
-	KS	Correspondence with client regarding proposed counterclaim.	0.30 185.00/hr	55.50
-	KS	Conference with J Cunningham regarding client's requests for immediate handling.	0.60 185.00/hr	111.00
3/13/2015 -	JC	Continue analysis of insured's complex proposed RICO claims for inclusion in proposed counter-claim and third party complaint.	0.70 185.00/hr	129.50
3/14/2015 -	JC	Multiple conferences with K. Schumann regarding preparation of insured's proposed counter-claim and future handling plan including regarding pending appeals.	0.30 185.00/hr	55.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/14/2015	- KS	Multiple correspondence with client regarding past handling and meeting next week to discuss future handling, cross claims, sanctions, etc.	0.80 185.00/hr	148.00
	- KS	Begin preparation for next week's meeting by reviewing RICO claims, counter-claim and evidence regarding false statements.	1.40 185.00/hr	259.00
3/15/2015	- KS	Multiple correspondence with client regarding next week's strategy and future handling meeting.	0.40 185.00/hr	74.00
3/16/2015	- JC	Continue drafting of insured's complex proposed counter-claim in federal court case including with insured's requested declaratory relief and RICO claims.	2.30 185.00/hr	425.50
	- DRR	meeting with KS regarding status and issues for Thursday's meeting with client	1.50 185.00/hr	277.50
	- DRR	review and analyze documents for meeting	0.80 185.00/hr	148.00
	- JC	Begin analysis of insured's lengthy proposed declaratory claims in counter-claim and third party complaint, including availability under California and federal declaratory relief statutes.	2.30 185.00/hr	425.50
3/17/2015	- KS	Conference with J Cunningham regarding handling of client's requests related to RICO claim and issues with Pennsylvania court reporter.	0.80 185.00/hr	148.00
	- JC	Continue analysis of insured's complex proposed RICO claims for inclusion in proposed counter-claim and third party complaint.	0.60 185.00/hr	111.00
	- JC	Continue analysis of insured's lengthy proposed declaratory claims in counter-claim and third party complaint, including availability under California and federal declaratory relief statutes.	1.40 185.00/hr	259.00
3/18/2015	- DRR	further preparation for tomorrow's meeting with client, including continuing review of documents, counter-claim and RICO claims.	0.50 185.00/hr	92.50
	- JC	Multiple telephone conferences with insured regarding preparation and analysis of insured's proposed third party complaint as against defendant, D. Anders.	0.50 185.00/hr	92.50
3/19/2015	- JC	Correspondence with insured regarding preparation and analysis of insured's proposed declaratory relief claim vs. plaintiffs in counter-claim.	0.20 185.00/hr	37.00
	- KS	Conference with J Cunningham and D Rosenberg regarding handling of client's third party claims.	0.40 185.00/hr	74.00
	-	[REDACTED]		

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/19/2015	- PB	Telephone call from client regarding future litigation handling and planning	0.20 95.00/hr	19.00
	- JC	Begin analysis of issues regarding application of California litigation privilege to insured's proposed defamation, infliction of emotional distress and related claims, toward potential inclusion in proposed counter-claim and third party complaint.	0.90 185.00/hr	166.50
3/20/2015	- PB	Follow-up telephone call from client regarding future litigation handling and planning	0.20 95.00/hr	19.00
	- KS	Correspondence with client regarding RICO claim and client's future handling concerns.	0.60 185.00/hr	111.00
	- KS	Telephone call from client regarding RICO claim, etc.	0.30 185.00/hr	55.50
3/23/2015	-	[REDACTED]		
	- KS	Conference with carrier regarding handling status.	0.20 185.00/hr	37.00
	- JC	Continue analysis of issues regarding application of California litigation privilege to insured's proposed defamation, infliction of emotional distress and related claims, toward potential inclusion in proposed counter-claim and third party complaint.	0.70 185.00/hr	129.50
3/24/2015	- JC	Draft attorney analysis for carrier regarding insured's proposed joint claims by insured and defendant, Defend Our Freedoms Foundations, via counter-claim and third party complaint.	0.60 185.00/hr	111.00
	- JC	Evaluation of complex issues regarding diversity jurisdiction relating to insured's proposed third party complaint, and related joinder issues.	0.80 185.00/hr	148.00
3/25/2015	- JC	Begin review and analysis of insured's newly submitted proposed counter-claim and third party complaint claims, for proposed inclusion in counter-claim and third party complaint.	0.80 185.00/hr	148.00
	- JC	Continue evaluation of complex issues regarding potential jurisdictional bases for insured to bring proposed third party complaint vs. D. Anders	0.80 185.00/hr	148.00
3/26/2015	- JC	Continue review and analysis of insured's newly submitted proposed counter-claim and third party complaint claims, for proposed inclusion in counter-claim and third party complaint.	0.50 185.00/hr	92.50
	- KS	Conference with D Rosenberg and J Cunningham regarding client's most recent email request and regarding tomorrow's future handling meeting with client.	1.30 185.00/hr	240.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/27/2015	- JC	Preparation for meeting with insured O. Taitz regarding future handling issues, including evaluation and preparation of proposed counterclaim and third party complaint.	0.80 185.00/hr	148.00
	- JC	Review and analysis of voluminous district court docket regarding insured's proposed motion to strike portions of appellees' excerpts of record on appeal.	1.30 185.00/hr	240.50
	- JC	Meeting with insured O. Taitz regarding future handling issues, including evaluation and preparation of proposed counterclaim and third party complaint.	2.50 185.00/hr	462.50
	- JC	Draft comprehensive future handling outline and examination of issues, following meeting with insured O. Taitz regarding future handling issues and evaluation and preparation of proposed counterclaim and third party complaint.	0.90 185.00/hr	166.50
	- JC	Continue drafting insured's lengthy proposed counter-claim and third party complaint incorporating insured's newly submitted numerous additions to such pleadings.	1.60 185.00/hr	296.00
	- KS	Conference with J Cunningham regarding client's handling requests.	0.40 185.00/hr	74.00
	- KS	Meeting with client regarding future handling, and preparation of future handling memorandum.	2.50 185.00/hr	462.50
3/28/2015	- KS	Finalize detailed memorandum to client regarding agreed to handling plan.	0.40 185.00/hr	74.00
	- KS	Conference with Jeff Cunningham regarding client's proposals.	0.40 185.00/hr	74.00
	- KS	Lengthy correspondence from client regarding counter claims.	0.60 185.00/hr	111.00
3/29/2015	- JC	Multiple correspondence with insured, and review declaration of witness C. Hale, regarding preparation of insured's proposed counterclaim and third party complaint.	0.50 185.00/hr	92.50
	- KS	Correspondence with client regarding meeting with client and handling plan.	0.40 185.00/hr	74.00
3/30/2015	- JC	Continue drafting insured's lengthy proposed counter-claim and third party complaint incorporating insured's newly submitted numerous additions to such pleadings.	1.30 185.00/hr	240.50
3/31/2015	- JC	Multiple conferences with insured regarding preparation of proposed counter-claim and third-party complaint.	0.50 185.00/hr	92.50
	- KS	Analyze latest version of client's proposed response and counter claim.	1.40 185.00/hr	259.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/1/2015	- KS	Conference with J Cunningham regarding meet and confer to opposing counsel to correct record on appeal.	0.20 185.00/hr	37.00
	- KS	Correspondence from client regarding urgency related to filing motion in appellate court.	0.20 185.00/hr	37.00
	- JC	Analysis of federal appellate rules regarding evaluation of insured's proposed motion to strike plaintiffs' excerpts of record in appeals.	1.10 185.00/hr	203.50
	- JC	Multiple correspondence with insured regarding insured's proposed motion to strike appellees' excerpts of record in appeals.	0.30 185.00/hr	55.50
	- JC	Draft meet and confer correspondence to opposing counsel regarding insured's proposed motion to strike appellees' excerpts of record in appeals.	0.50 185.00/hr	92.50
	- KS	Conference with J Cunningham regarding change of immediate strategy.	0.40 185.00/hr	74.00
4/2/2015	- JC	Multiple correspondence with insured regarding insured's revisions to meet and confer correspondence regarding proposed motion to strike appellees' excerpts of record in appeals.	0.30 185.00/hr	55.50
	- JC	Begin drafting insured's motion to strike portions of appellees' excerpts of record on appeal.	1.10 185.00/hr	203.50
	- KS	Conference with carrier regarding status of appeal and possible cross claims.	0.70 185.00/hr	129.50
4/3/2015	- KS	Multiple conferences with J Cunningham regarding client's requests and handling.	1.40 185.00/hr	259.00
	- KS	Correspondence with client regarding appellate motion and cross claim.	0.80 185.00/hr	148.00
	- JY	Revise/finalize letter to opposing counsel regarding Supplemental Excerpts of Record.	0.20 95.00/hr	19.00
	- KS	Conference with J Cunningham regarding witness statements from Texas witnesses.	0.30 185.00/hr	55.50
	- KS	Conference with J Cunningham regarding amending demand to opposing counsel regarding appellate record.	0.30 185.00/hr	55.50
4/4/2015	- JC	Continue review and analysis of voluminous appellees' supplemental excerpts of record in appeal, toward support for insured's motion to strike improper excerpts.	1.20 185.00/hr	222.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/6/2015	- KS	Correspondence with carrier regarding motion in court of appeals.	0.20 185.00/hr	37.00
	- JC	Continue drafting insured's complex motion to strike portions of appellees' excerpts of record on appeal.	5.20 185.00/hr	962.00
	- JC	Review opposing counsel's 4/6/15 correspondence regarding meet and confer on insured's motion to strike portions of appellees' excerpts of record on appeal.	0.30 185.00/hr	55.50
4/7/2015	- KS	Conference with J Cunningham regarding amendments to motion for sanctions and issues with cross and counter claims.	0.80 185.00/hr	148.00
	- JC	Begin review and analysis of insured's lengthy requested revisions to proposed counter-claim and third party complaint.	0.50 185.00/hr	92.50
	- JC	Continue analysis of jurisdictional and procedural issues raised regarding insured's lengthy and newly requested revisions to proposed counter-claim and third party complaint.	0.60 185.00/hr	111.00
	- JC	Begin analysis of insured's requested motion to be filed in appeal, to strike plaintiffs' first amended complaint for violation of filing order, and related jurisdictional issues.	1.10 185.00/hr	203.50
	- JC	Continue drafting insured's complex motion to strike portions of appellees' excerpts of record on appeal, including with insured's several revisions.	2.60 185.00/hr	481.00
	- JC	Multiple telephone conferences with Court of Appeals motions unit, regarding insured's motion to strike portions of appellees' excerpts of record on appeal.	0.30 185.00/hr	55.50
	- JC	Several conferences with insured regarding insured's proposed motion to be filed in appeal, to strike plaintiffs' first amended complaint for violation of filing order.	0.90 185.00/hr	166.50
	- CAB	Receipt and review faxed correspondence from Gittler & Bradford advising they are in receipt of our 4/3/15 letter	0.10 95.00/hr	9.50
	- KS	Correspondence from client with multiple changes and amendments.	0.80 185.00/hr	148.00
4/8/2015	- JC	Continue drafting insured's complex motion to strike portions of appellees' excerpts of record on appeal, including with insured's several revisions.	1.80 185.00/hr	333.00
	- JC	Continue analysis of insured's requested motion to be filed in appeal, to strike plaintiffs' first amended complaint for violation of filing order, and related complex jurisdictional issues.	1.10 185.00/hr	203.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/8/2015	- JC	Numerous conferences with insured regarding insured's revisions to motion to strike portions of appellees' excerpts of record in appeal.	1.40 185.00/hr	259.00
	- KS	Telephone call from client regarding desire to add language regarding order from lower court.	0.20 185.00/hr	37.00
	- KS	Correspondence with client regarding order from lower court.	0.20 185.00/hr	NO CHARGE
	-	[REDACTED]		
4/9/2015	- SB	draft analysis of case law to determine whether we can move for dismissal given plaintiff's violation of lower court order.	0.60 170.00/hr	102.00
	- SB	analyze case law to determine whether we can move for dismissal given plaintiff's violation of lower court order.	2.90 170.00/hr	493.00
	- JC	Conference with insured regarding motions in appeals.	0.50 185.00/hr	92.50
	- KS	Conference with J Cunningham regarding research requested by client.	0.40 185.00/hr	74.00
	- KS	Telephone conference with carrier regarding upcoming motions and research.	0.20 185.00/hr	37.00
	- KS	Correspondence with carrier regarding cross claims.	0.30 185.00/hr	55.50
	- KS	Conference call with client regarding motion for sanctions.	0.50 185.00/hr	92.50
	- KS	Amend correspondence to client regarding whether to seek certain sanctions in client's appeal.	0.30 185.00/hr	55.50
	-	[REDACTED]		
4/10/2015	- JC	Continue review and analysis of complex legal issues regarding insured's requested motion to strike first amended complaint, and appellees' brief, in connection with appeal.	1.40 185.00/hr	259.00
	- PB	Plan and prepare for filing of emergency motion pursuant to client's request in Court of Appeals	0.20 95.00/hr	19.00
	- JC	Continue drafting insured's complex motion to strike appellees' answering brief in appeal, including with insured's several revisions.	2.30 185.00/hr	425.50



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			<u>Hrs/Rate</u>	<u>Amount</u>
4/10/2015	- PB	Communicate with 9th Circuit, Court of Appeals motion clerk regarding submission of emergency motion	0.10 95.00/hr	9.50
	- KS	Conference with J Cunningham regarding changes to motion and regarding research results.	0.60 185.00/hr	111.00
	-	[REDACTED]		
	- PB	Review, edit, and finalize emergency motion for filing and consideration by 9th Circuit Court of Appeals	0.80 95.00/hr	76.00
4/11/2015	- KS	Conference with J Cunningham regarding client's 4/8 e-mail regarding Pennsylvania 2010 order, etc.	0.40 185.00/hr	74.00
4/13/2015	- JC	Draft attorney analysis for insured regarding jurisdictional issues regarding insured's proposed third party complaint.	0.70 185.00/hr	129.50
	- KS	Conference with J Cunningham regarding handling of client's cross and counterclaims.	0.40 185.00/hr	74.00
	- JC	Multiple correspondence and telephone conference with insured, as counsel for co-defendants, regarding preparation of Defend Our Freedoms Foundations' motion in consolidated appeals.	0.40 185.00/hr	74.00
4/16/2015	- KS	Conference with J Cunningham regarding opposing counsel's opposition.	0.60 185.00/hr	111.00
	- JC	Begin review and analysis of appellees' opposition to insured's motion to strike portions of appellees' excerpts of record.	0.50 185.00/hr	92.50
	- JC	Multiple telephone conferences with insured regarding preparation of proposed counterclaim.	0.30 185.00/hr	55.50
4/17/2015	- JC	Begin review and analysis of insured's proposed legal arguments for preparation of reply to appellees' opposition to insured's motion in appeal to strike portions of appellees' excerpts of record.	0.60 185.00/hr	111.00
	- JC	Draft comprehensive attorney analysis of insured's potential counterclaim and third party complaint, including on complex jurisdictional and standing issues.	1.20 185.00/hr	222.00
	- KS	Correspondence with client regarding reply to opposing counsel's opposition to motion for sanctions.	0.30 185.00/hr	55.50
	- JC	Conference with insured regarding preparation of reply Memorandum of Points and Authorities regarding motion to strike appellees' excerpt of record, and preparation of motion of co-defendant (represented by insured) to strike amended complaint in consolidated appeals.	1.50 185.00/hr	277.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/17/2015	- JC	Begin review and analysis of proposed motion to strike first amended complaint by insured (as counsel for co-defendant), coordinated with insured's motion to strike portions of appellees' excerpts of record in consolidated appeals.	1.40 185.00/hr	259.00
	- CAB	Discussion with Jeff Cunningham and preparation of instructions to Nationwide to obtain certified copies of the criminal court documents relating to Case No. FWV028000 (Lisa Liberi)	0.20 95.00/hr	NO CHARGE
	- JC	Review and analysis of order denying insured's request for emergency motion in court of appeals, and transmitting insured's motion in appeal to court motions panel.	0.40 185.00/hr	74.00
	- JC	Multiple correspondence with insured regarding preparation of reply to appellees' opposition to insured's motion in appeal to strike portions of appellees' excerpts of record.	0.40 185.00/hr	74.00
4/18/2015	- KS	Lengthy correspondence from client regarding response to opposing counsel's opposition, and client's concerns.	0.70 185.00/hr	129.50
4/19/2015	- KS	Finalize analysis for carrier regarding client's request for authority.	0.60 185.00/hr	111.00
	- JC	Begin drafting insured's reply Memorandum of Points and Authorities and declaration regarding motion to strike appellees' answering brief in appeal.	1.80 185.00/hr	333.00
4/20/2015	- JC	Multiple telephone conferences with Motions Unit of Court of Appeals regarding April 17, 2015 order regarding insured's motion to strike portions of appellees' excerpts.	0.30 185.00/hr	55.50
	- JC	Continue drafting insured's reply Memorandum of Points and Authorities and declaration regarding motion to strike appellees' answering brief in appeal.	1.40 185.00/hr	259.00
4/21/2015	- CAB	Review and forward requested documents to client.	0.20 95.00/hr	19.00
	- JC	Continue drafting of insured's proposed lengthy counterclaim.	1.20 185.00/hr	222.00
	- CAB	Telephone calls from client Orly Taitz requesting copies of letters sent to Plaintiff's counsel Marcus	0.20 95.00/hr	19.00
	- KS	Correspondence from client regarding prior bankruptcy.	0.30 185.00/hr	55.50
4/22/2015	- KS	Conference with J Cunningham and P Batiller regarding filing of client's pleadings today.	0.40 185.00/hr	74.00
	- KS	Correspondence with carrier regarding pleading updates.	0.60 185.00/hr	111.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/22/2015	- PB	Review, revise and edit reply brief	0.70 95.00/hr	66.50
4/24/2015	- JC	Multiple correspondence with insured regarding preparation of counterclaim and third party complaint.	0.30 185.00/hr	55.50
	- JY	Telephone conference with client regarding status of pleadings and meeting.	0.20 95.00/hr	19.00
	- JY	Review email correspondences to/from client regarding meeting.	0.10 95.00/hr	9.50
4/26/2015	- KS	Correspondence with carrier regarding client's motions to strike.	0.30 185.00/hr	55.50
4/27/2015	- JC	Review initial order on motion of co-defendant, Defend Our Freedoms Foundations, in consolidated appeal with insured, O. Taitz, to strike appellees' excerpts on appeal.	0.40 185.00/hr	74.00
	- CAB	Telephone call from Nationwide regarding three volumes of criminal records (1,800 - 2,000 pages) and request of docket for review.	0.10 95.00/hr	9.50
	- KS	Conference regarding court of appeals order regarding expedited hearing.	0.30 185.00/hr	55.50
	- KS	Examination of opposing counsel's 108 page "response opposing motion."	3.30 185.00/hr	610.50
	- EA	Analysis of potential counter-claim against Plaintiff's alleged conspirators relating to potential FRCP Rule 11 violations.	1.30 170.00/hr	221.00
	- EA	Conference with J Cunningham relating to counter-claim against Plaintiff's alleged conspirators relating to potential FRCP Rule 11 violations.	0.30 170.00/hr	51.00
4/28/2015	- JC	Multiple correspondence and telephone conference with insured, regarding preparation of insured's detailed counterclaim, and discovery regarding plaintiff Liberi court filings.	0.50 185.00/hr	92.50
	- JC	Conduct conference with carrier regarding insured's proposed counterclaim and third party complaint.	0.50 185.00/hr	92.50
	- KS	Conference with J Cunningham regarding update to carrier.	0.60 185.00/hr	111.00
	- KS	Conference with J Cunningham regarding defamatory publications by plaintiff.	0.80 185.00/hr	148.00
	- KS	Analyze proposed counterclaim and answer.	0.70 185.00/hr	129.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/28/2015	- JC	Review appellees' opposition Memorandum of Points and Authorities and declaration to motion of co-defendant, Defend Our Freedoms Foundations, in consolidated appeal with insured, O. Taitz, to strike appellees' excerpts on appeal.	0.70 185.00/hr	129.50
	- JC	Continue drafting insured's proposed and lengthy counterclaim with insured's additional claims and allegations.	1.50 185.00/hr	277.50
	- KS	Prepare for conference call with carrier.	0.80 185.00/hr	148.00
	- KS	Conference call with Joyce Segelken and Laurie Johnson regarding counterclaim.	0.50 185.00/hr	92.50
	- KS	Correspondence from carrier regarding future handling and issues related to counterclaim.	0.40 185.00/hr	74.00
	- KS	Conference with carrier regarding budget.	0.20 185.00/hr	37.00
	-	[REDACTED]		
	- KS	Correspondence with carrier regarding handling issues.	0.20 185.00/hr	37.00
4/29/2015	- JC	Draft detailed memorandum regarding conferences with insured regarding preparation of insured's detailed counterclaim, and discovery regarding plaintiff Liberi court filings.	0.90 185.00/hr	166.50
	- KS	Preparation for meeting with client.	0.70 185.00/hr	129.50
	- KS	Conference with J Cunningham regarding client concerns.	0.80 185.00/hr	148.00
	- KS	Correspondence with carrier regarding update and conference call.	0.30 185.00/hr	55.50
	- KS	Correspondence to client regarding future handling, her concerns, etc.	1.20 185.00/hr	222.00
	- KS	Telephone conference with carrier regarding update.	0.80 185.00/hr	148.00
4/30/2015	- KS	Correspondence with client regarding counterclaim.	0.20 185.00/hr	37.00
	- KS	Conference with J Cunningham regarding counterclaim and third party claim.	0.80 185.00/hr	148.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/30/2015	- KS	Correspondence with carrier and client regarding counterclaim.	0.30 185.00/hr	55.50
-				
-	KS	Conference with J Cunningham regarding future handling with amended demands by client. On hold after conference call with carrier.	0.60 185.00/hr	111.00
5/1/2015	- KS	Correspondence with carrier regarding counterclaim.	0.20 185.00/hr	37.00
5/4/2015	- KS	Correspondence with carrier regarding client meeting on Thursday.	0.20 185.00/hr	37.00
-	JC	Partner conference with K Schumann regarding preparation of insured's counterclaim.	0.40 185.00/hr	74.00
-	KS	Correspondence with client regarding meeting.	0.30 185.00/hr	55.50
-				
5/5/2015	- JC	Multiple correspondence with carrier in preparation for upcoming conference regarding insured's counterclaim and third party complaint.	0.30 185.00/hr	55.50
-	KS	Correspondence from carrier regarding position related to filing counterclaim and third party claim.	0.40 185.00/hr	74.00
-	KS	Preparation for tomorrow's meeting with client, including review and analysis of appellate pleadings, counterclaim and third party complaint.	2.20 185.00/hr	407.00
-	JC	Review and analysis of reply Memorandum of Points and Authorities of co-defendant, Defend Our Freedoms (represented by insured), regarding motion to strike appellees' brief in consolidated appeals.	1.10 185.00/hr	203.50
5/6/2015	- JC	Review and analysis lengthy docket entries, and draft related memorandum regarding case history, in preparation for conferences with insured and carrier regarding pleadings and future handling plan.	2.10 185.00/hr	388.50
-	JC	Preparation for upcoming meeting with insured regarding appeals and district court pleadings issues, development of related future handling plan, and related review of insured's revised counterclaim and third party complaint.	2.10 185.00/hr	388.50

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			Hrs/Rate	Amount
5/6/2015	- JC	Conduct meeting with insured regarding appeals and district court pleadings issues, and development of related future handling plan including regarding insured's counterclaim and third party complaint.	2.20 185.00/hr	407.00
	- KS	Meeting with client and husband.	1.50 185.00/hr	277.50
	- JC	Review and analysis of carrier's updated coverage letter to insured, including regarding counterclaim and third party complaint issues.	0.60 185.00/hr	111.00
	- KS	Conference with J Cunningham regarding future handling, as pursuant to client request.	0.60 185.00/hr	111.00
	- KS	Correspondence to carrier, pursuant to client request.	0.20 185.00/hr	37.00
5/7/2015	- KS	Correspondence with client regarding insurance policy and defense costs.	0.20 185.00/hr	37.00
	- JC	Conference with insured and carrier regarding proposed pleadings and future handling plan.	1.50 185.00/hr	277.50
	- JC	Begin evaluation of issues regarding potential affirmative defense by insured based on setoff, for inclusion in answer to complaint.	0.70 185.00/hr	129.50
	- KS	Meeting with carrier and client.	1.50 185.00/hr	277.50
	-	[REDACTED]		
	- JC	Multiple correspondence with insured and carrier regarding defense expense issues.	0.40 185.00/hr	74.00
	- KS	Correspondence from carrier regarding defense costs, etc.	0.20 185.00/hr	37.00
5/8/2015	-	[REDACTED]		
	- JC	Preparation of comprehensive summary and analysis regarding conferences with insured and carrier, including future handling plan inclusive of pleadings strategy	1.40 185.00/hr	259.00
	- KS	Examination of recent statements by Berg regarding Orly.	1.20 185.00/hr	222.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/11/2015	JC	Partner conference regarding preparation of insured's proposed motions to dismiss and strike regarding plaintiffs' first amended complaint.	0.30 185.00/hr	55.50
5/12/2015	-	[REDACTED]	[REDACTED]	[REDACTED]
	- KS	Correspondence from client regarding request for carrier authority.	0.40 185.00/hr	74.00
	- KS	Conference with J Cunningham regarding request to finalize 12b motions .	0.40 185.00/hr	74.00
	- KS	Correspondence with client regarding carrier contact.	0.20 185.00/hr	NO CHARGE
	-	[REDACTED]	[REDACTED]	[REDACTED]
	- KS	Correspondence from client regarding 12b proposed responses.	0.20 185.00/hr	37.00
	-	[REDACTED]	[REDACTED]	[REDACTED]
5/13/2015	EA	Analyze potential motions in limine to consider to counteract abusive trial tactics by Plaintiff's counsel, in order to formulate specific discovery plan to develop the necessary evidence in discovery to substantiate the tactical motions in limine.	1.40 185.00/hr	259.00
	-	[REDACTED]	[REDACTED]	[REDACTED]
5/14/2015	-	[REDACTED]	[REDACTED]	[REDACTED]
5/15/2015	JC	Multiple correspondence with insured regarding preparation of motions to dismiss for lack of jurisdiction and insufficient claims.	0.30 185.00/hr	55.50
5/18/2015	-	[REDACTED]	[REDACTED]	[REDACTED]
	- JC	Begin drafting of insured's motions to strike amended complaint, for lack of jurisdiction and failure to state claims, and pursuant to carrier authority.	0.50 185.00/hr	92.50
5/20/2015	EG	Begin work on drafting 12(b)1 motion per client request.	0.50 95.00/hr	47.50
	- EG	Begin work on drafting 12(b)6 motion pursuant to client request.	0.60 95.00/hr	57.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/21/2015	- KS	Correspondence with client regarding new affirmative claims and counterclaims.	0.70 185.00/hr	129.50
	- JC	Several correspondence with insureds regarding potential claims against Plaintiffs and third parties, Plaintiffs' potential new defamatory publications, and related future handling plan.	0.60 185.00/hr	111.00
	- KS	Correspondence with client regarding new book by plaintiff.	0.30 185.00/hr	55.50
	- EG	Continue work on drafting 12(b)1 motion pursuant to client request.	0.70 95.00/hr	66.50
	- EG	Continue work on drafting 12(b)6 motion pursuant to client request.	1.20 95.00/hr	114.00
	- JC	Multiple correspondence with insured regarding preparation of motions to dismiss regarding lack of jurisdiction and failure to state claims.	0.30 185.00/hr	55.50
	-	[REDACTED]		
5/22/2015	- EG	Continue work on drafting 12(b)6 motion pursuant to client request.	1.70 95.00/hr	161.50
	- JC	Review and continue drafting insured's FRCP Rule 12(b)(6) motion to dismiss to amended complaint and pursuant to carrier approval.	2.20 185.00/hr	407.00
	- JC	Correspondence with insured regarding insured's FRCP Rule 12(b)(6) motion to dismiss to amended complaint.	0.20 185.00/hr	37.00
	- EG	Review and analyze relevant legal authority for purpose of drafting 12(b)6 motion pursuant to client request.	2.30 95.00/hr	218.50
5/23/2015	- JC	Continue drafting of insured's motions to strike amended complaint, for lack of jurisdiction and failure to state claims, and pursuant to carrier authority.	1.40 185.00/hr	259.00
5/26/2015	- JC	Continue drafting of insured's motions to strike amended complaint, for lack of jurisdiction and failure to state claims, and pursuant to carrier authority.	1.20 185.00/hr	222.00
	- JC	Begin review and analysis of insured's new proposed claims for defamation in proposed counterclaim.	0.80 185.00/hr	148.00
5/27/2015	- KS	Conference with J Cunningham regarding 12(b)(1).	0.40 185.00/hr	74.00



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			Hrs/Rate	Amount
5/28/2015	JC	Multiple correspondence with insured regarding preparation of insured's motions to strike amended complaint, for lack of jurisdiction and failure to state claims.	0.30 185.00/hr	55.50
5/29/2015	JC	Multiple correspondence with insured regarding preparation of FRCP Rule 12 motion to dismiss.	0.30 185.00/hr	55.50
	- KS	Telephone conference with counsel regarding counter-claim.	0.30 185.00/hr	55.50
5/30/2015	KS	Correspondence with client regarding opposing counsel and possible cross claim.	0.30 185.00/hr	55.50
5/31/2015	JC	Multiple correspondence with insured and N. Sankey regarding criminal record of defendant, L. Liberi.	0.30 185.00/hr	55.50
6/1/2015	KS	Correspondence from client regarding bail information.	0.50 185.00/hr	92.50
	- KS	Correspondence from client regarding her possible cross claim, and regarding prior order against Berg.	0.40 185.00/hr	74.00
	-	[REDACTED]		
	- KS	Correspondence from client regarding criminal indictment.	0.50 185.00/hr	92.50
6/2/2015	KS	Correspondence from client regarding felony theft by plaintiff.	0.40 185.00/hr	74.00
6/3/2015	KS	Conference with client regarding counterclaims.	0.20 185.00/hr	37.00
	- KS	Correspondence from client regarding plaintiff's release of information.	0.20 185.00/hr	37.00
6/4/2015	KS	Conference with J. Cunningham regarding Liberi impeachment evidence.	0.50 185.00/hr	92.50
	- KS	Telephone conference with client regarding evidence against plaintiff.	0.50 185.00/hr	92.50
	- KS	Correspondence from client regarding Liberi's release of personal information.	0.20 185.00/hr	37.00
	- JC	Begin review and analysis of declaration and related documents of plaintiff, L. Liberi, in Richardson criminal case regarding publication of private information, and toward support for insured's motion to dismiss.	0.80 185.00/hr	148.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/4/2015	- KS	Correspondence from client regarding DA's release of Liberi's social security number.	0.40 185.00/hr	74.00
6/5/2015	- JC	Review and analysis of plea agreement in criminal case regarding plaintiff, L. Liberi, toward support for insured's motion to dismiss regarding lack of jurisdiction.	0.50 185.00/hr	92.50
	- JC	Correspondence with insured's private counsel, M. Colen, regarding court records regarding plaintiff, L. Liberi.	0.20 185.00/hr	37.00
6/6/2015	-	[REDACTED]		
6/8/2015	- KS	Telephone call to carrier regarding update.	0.20 185.00/hr	37.00
	- JC	Review declaration of M. Strickland and District Attorney motion regarding bail in criminal cases regarding plaintiff, L. Liberi.	0.70 185.00/hr	129.50
	- KS	Correspondence with client regarding Liberi's sentence.	0.40 185.00/hr	74.00
	- KS	Conference with J. Cunningham regarding impeachment evidence.	0.70 185.00/hr	129.50
	- KS	Correspondence with carrier regarding plaintiff's criminal record.	0.20 185.00/hr	37.00
6/9/2015	- KS	Correspondence with client regarding missing records.	0.20 185.00/hr	37.00
	- KS	Correspondence with client regarding status.	0.20 185.00/hr	37.00
	- JC	Multiple correspondence with insured regarding preparation of motion to dismiss regarding plaintiff, L. Liberi, and related preparation of supporting request for judicial notice.	0.30 185.00/hr	55.50
	- KS	Multiple calls with client regarding 12b6.	0.30 185.00/hr	55.50
6/10/2015	- KS	Conference with J. Cunningham regarding response for client.	0.20 185.00/hr	37.00
	-	[REDACTED]		
	- KS	Correspondence from client regarding plaintiff's release of social security information.	0.30 185.00/hr	55.50
	- KS	Correspondence from client regarding Rock Salt summons and regarding 12b1.	0.30 185.00/hr	55.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/10/2015	- KS	Conference with J. Cunningham regarding applicability of 12b1 to prior dismissal.	0.30 185.00/hr	55.50
6/17/2015	- JC	Review notice regarding disbarment of plaintiff, P. Berg, and towards evaluation of damages and representation issues.	0.30 185.00/hr	55.50
6/18/2015	- KS	Conference with J. Cunningham regarding effect on diversity.	0.20 185.00/hr	37.00
	- KS	Correspondence with client regarding co-defendant, Sundquist, amendment.	0.30 185.00/hr	55.50
	- KS	Correspondence with client regarding Berg's disbarment.	0.30 185.00/hr	55.50
	- JC	Begin review and analysis of motion of defendant, Rock Salt Publishing, and related affidavit, regarding lack of jurisdiction, toward potential support for insured's proposed motion to dismiss regarding lack of jurisdiction.	1.00 185.00/hr	185.00
	- JC	Multiple correspondence with insured regarding potential use of motion of former defendant, J. Sundquist, to support motion to dismiss.	0.30 185.00/hr	55.50
	- KS	Correspondence with client regarding resignation by Berg.	0.60 185.00/hr	111.00
6/25/2015	- KS	Correspondence with client regarding Liberi's bank thefts.	0.40 185.00/hr	74.00
6/26/2015	- JC	Review and analysis of court of appeal's order denying motion by co-appellant Defend Our Freedoms Foundations, to strike first amended complaint in relation to its and insured's appeals.	0.40 185.00/hr	74.00
6/28/2015	- KS	Correspondence with client regarding evidence.	0.20 185.00/hr	NO CHARGE
	- JC	Review and analysis of court opinion in Hollister case regarding plaintiff, P. Berg, and potential use for motion for sanctions by insured.	0.30 185.00/hr	55.50
	- KS	Conference with J. Cunningham regarding diversity issue related to prior co-defendant.	0.30 185.00/hr	55.50
	- KS	Correspondence with carrier regarding opposing counsel being disbarred.	0.30 185.00/hr	55.50
6/29/2015	- KS	Conference with carrier regarding status and budget. Once the court of appeal rules, we will provide an updated budget.	0.30 185.00/hr	55.50
7/1/2015	- KS	Correspondence from client with lengthy proposed counter and cross claims.	1.10 185.00/hr	203.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/2/2015	- JC	Multiple correspondence with insured regarding various police reports regarding plaintiff, L. Liberi, toward investigation into crimes and evaluation of use by insured in defense of defamation based claims.	0.30 185.00/hr	55.50
	- JC	Correspondence with insured regarding plaintiff, P. Berg, disbarment.	0.30 185.00/hr	55.50
7/3/2015	- JC	Begin review and analysis of various police reports regarding plaintiff, L. Liberi, toward investigation into crimes and evaluation of use by insured in defense of defamation based claims.	0.60 185.00/hr	111.00
7/6/2015	- KS	Correspondence with client regarding declaration from Sankey and willingness to cooperate.	0.40 185.00/hr	74.00
	- JC	Correspondence with insured regarding preparation of declaration of defendant, N. Sankey, regarding public documents of plaintiffs, L. Liberi and L. Ostella.	0.20 185.00/hr	37.00
	- KS	Conference with J. Cunningham regarding possible effect of DOFF's separate filings - response from US Court of Appeals.	0.60 185.00/hr	111.00
7/8/2015	- KS	Correspondence with client regarding Ostella evidence related to personal information.	0.30 185.00/hr	55.50
7/10/2015	- KS	Correspondence with client regarding witness declaration.	0.30 185.00/hr	55.50
7/14/2015	- KS	Correspondence from client regarding Sankey declaration.	0.30 185.00/hr	55.50
	- JC	Review and analysis of declaration of former defendant, N. Sankey, provided by insured regarding investigation into plaintiffs, L. Liberi and L. Ostella.	0.50 185.00/hr	92.50
	- JC	Review and analysis of evidence provided by insured regarding publications by plaintiffs, L. Liberi and L. Ostella, of personal information into public record.	0.40 185.00/hr	74.00
7/15/2015	- JC	Review and analysis of affidavit of witness N. Sankey regarding investigation into plaintiffs, L. Liberi and L. Ostella, and related evaluation of federal court admissibility requirements toward potential revised affidavit.	0.60 185.00/hr	111.00
7/20/2015	- KS	Conference with Jeff Cunningham regarding communications from Berg.	0.20 185.00/hr	37.00
7/21/2015	- KS	Conference with J. Cunningham regarding effect of declaration.	0.30 185.00/hr	55.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/21/2015	- JC	Multiple correspondence with insured regarding declaration of former defendant, N. Sankey, regarding investigation of plaintiff, L. Ostella.	0.30 185.00/hr	55.50
	- KS	Correspondence with client regarding Sankey declaration.	0.30 185.00/hr	55.50
7/23/2015	- KS	Meeting with carrier regarding status.	0.80 185.00/hr	148.00
	- KS	Correspondence from client regarding Ostella v. IRBSEARCH.	0.80 185.00/hr	148.00
7/27/2015	- JC	Multiple correspondence with insured regarding proposed use of order and findings in related Florida case, regarding Communications Decency Act defense, for insured's motion to dismiss.	0.30 185.00/hr	55.50
7/28/2015	- JC	Begin review and analysis of order and findings in related Florida case, regarding Communications Decency Act defense, for potential use in insured's motion to dismiss.	0.60 185.00/hr	111.00
7/29/2015	- JC	Continue review and analysis of order and findings in related Florida case, regarding Communications Decency Act defense, for potential use in insured's motion to dismiss.	0.40 185.00/hr	74.00
7/31/2015	- JC	Continue review and analysis of order and findings in related Florida case, regarding Communications Decency Act defense, for potential use in insured's motion to dismiss.	0.50 185.00/hr	92.50
8/7/2015	- EG	Continue evaluation of insured's Communications Decency Act defense, including review of plaintiffs' voluminous amended complaint, regarding alleged publications and potential use in motion to dismiss.	2.10 170.00/hr	357.00
	- JC	Continue evaluation of insured's Communications Decency Act defense, regarding alleged publications and potential use in motion to dismiss.	0.40 185.00/hr	74.00
8/17/2015	- EG	Continue evaluation of insured's Communications Decency Act defense, including review of plaintiffs' voluminous amended complaint, regarding alleged publications and potential use in motion to dismiss.	1.30 170.00/hr	221.00
8/18/2015	- JC	Continue analysis of plaintiffs' lengthy first amended complaint, toward evaluation of insureds' Communications Decency Act defense for potential use in motion to dismiss.	0.40 185.00/hr	74.00
9/6/2015	- JC	Begin review and analysis of lengthy revised proposed counterclaim and cross claim.	1.20 185.00/hr	222.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/7/2015	- JC	Continue review and analysis of lengthy revised proposed counterclaim and cross claim.	0.90 185.00/hr	166.50
9/8/2015	- KS	Conference with J. Cunningham regarding client's new cross claim.	0.30 185.00/hr	55.50
	- KS	Correspondence with client regarding status.	0.20 185.00/hr	37.00
9/14/2015	- JC	Correspondence with insured regarding preparation of proposed counterclaim.	0.20 185.00/hr	37.00
9/15/2015	- KS	Correspondence with client regarding amendments to her cross-complaint.	0.40 185.00/hr	74.00
9/29/2015	- KS	Correspondence with carrier regarding oral argument.	0.20 185.00/hr	37.00
	- JC	Review notices of oral argument in insured's appeal and related appeal by defendant, Defend Our Freedoms Foundations.	0.40 185.00/hr	74.00
9/30/2015	- JC	Preparation of insured's acknowledgement of oral argument in insured's appeal and consolidated appeal of defendant, Defend Our Freedoms Foundations.	0.30 185.00/hr	55.50
	- PB	Finalize acknowledgement of notice for hearing in 9th Circuit Court of Appeals	0.20 95.00/hr	19.00
	- KS	Correspondence with client regarding oral argument.	0.20 185.00/hr	37.00
	- KS	Telephone call from client regarding oral argument.	0.20 185.00/hr	37.00
	- KS	Multiple correspondence with client regarding oral argument and opposing counsel's incorrect filing.	0.40 185.00/hr	74.00
	- JC	Multiple correspondence and telephone conferences with insured regarding preparation of objections to plaintiffs' representation statement in insured's appeal and consolidated appeal of defendant, Defend Our Freedoms Foundations.	0.50 185.00/hr	92.50
10/1/2015	- KS	Multiple correspondence with client regarding appeal.	0.40 185.00/hr	74.00
10/8/2015	- KS	Correspondence from client regarding requested changes to future handling.	0.20 185.00/hr	37.00
	- KS	Conference with J. Cunningham regarding client's request for extra time, strategy for argument at appeal.	0.40 185.00/hr	74.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/8/2015	- JC	Multiple correspondence with insured regarding preparation for oral argument in insured's appeal.	0.30 185.00/hr	55.50
10/13/2015	- JC	Preparation of proposed budget items regarding insured's appeal.	0.40 185.00/hr	74.00
10/14/2015	- KS	Conference with J. Cunningham regarding appellate arguments.	0.80 185.00/hr	148.00
10/15/2015	- JC	Telephone conference with court of appeal clerk regarding motion for additional time for oral argument in insured's and other defendant's related appeals.	0.30 185.00/hr	55.50
	- JC	Multiple correspondence with insured and opposing counsel regarding motion for additional time for oral argument in insured's and other defendants' appeals.	0.30 185.00/hr	55.50
	- JC	Begin drafting of joint motion for extension of oral argument in insured's and other defendant's related appeals.	1.50 185.00/hr	277.50
	- JC	Begin review and analysis of proposed motion for extension of oral argument, prepared by insured, in appeals by insured and defendant, Defend Our Freedoms Foundations.	0.70 185.00/hr	129.50
	- KS	Correspondence with carrier regarding budget.	0.20 185.00/hr	37.00
	- KS	Correspondence with J. Cunningham regarding client's request for extra time at appeal.	0.30 185.00/hr	55.50
	- KS	Correspondence with carrier regarding appeal.	0.20 185.00/hr	NO CHARGE
10/16/2015	- JC	Continue drafting of joint motion for extension of oral argument in insured's and other defendant's related appeals, and related supporting documents.	1.60 185.00/hr	296.00
10/19/2015	- JC	Multiple correspondence with insured regarding preparation of insured's and related defendant's motion to extend oral argument in appeals.	0.30 185.00/hr	55.50
10/20/2015	- JC	Continue drafting of joint motion for extension of oral argument in insured's and other defendant's related appeals, and related supporting documents including proposed order.	2.50 185.00/hr	462.50
	- VS	Review and revise Motion for An Order Allowing Longer Oral Argument By Appellants and proposed order.	0.70 95.00/hr	66.50
	- JC	Multiple correspondence with insured regarding revised motion for extension regarding oral argument in insured's and related defendant's appeals.	0.30 185.00/hr	55.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/23/2015	- KS	Conference with J. Cunningham regarding Florida companion case.	0.40 185.00/hr	74.00
	- JC	Review docket in related Florida case, and correspondence with insured, regarding dismissal of Florida case.	0.40 185.00/hr	74.00
10/28/2015	- KS	Correspondence from client regarding Malicious Prosecution.	0.30 185.00/hr	55.50
10/29/2015	- KS	Correspondence from client regarding conflicting evidence related to Ostella.	0.30 185.00/hr	55.50
	- KS	Conference with carrier regarding appeal and future handling after appeal.	0.60 185.00/hr	111.00
	- KS	Correspondence with client regarding investigator.	0.20 185.00/hr	37.00
	- KS	Correspondence with client regarding her amendments.	0.30 185.00/hr	55.50
11/1/2015	- JC	Several correspondence with insured, and review of 2010 order provided by insured, regarding preparation for upcoming oral argument in insured's appeal, regarding lack of diversity jurisdiction.	0.50 185.00/hr	92.50
11/4/2015	-			
11/5/2015	- JC	Review and analysis of voluminous insured's and respondents' briefs, and voluminous record on appeal, toward preparation for upcoming oral argument in insured's appeal.	0.90 185.00/hr	166.50
11/12/2015	- KS	Correspondence from client with her proposed updated pleading language.	0.40 185.00/hr	74.00
	- KS	Correspondence with client regarding witness locations.	0.30 185.00/hr	55.50
11/16/2015	- KS	Correspondence with client regarding locating witness.	0.20 185.00/hr	37.00
11/23/2015	- JC	Continue review and analysis of voluminous appellate briefing in insured's appeal, toward preparation for upcoming oral argument in insured's and related defendant's appeals.	1.90 185.00/hr	351.50
	- JC	Review and analysis of court of appeals' order on various motions by insured in her and related appeals.	0.40 185.00/hr	74.00
11/24/2015	- KS	Conference with J. Cunningham regarding oral argument.	0.20 185.00/hr	37.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
11/24/2015 -	KS	Telephone call from client regarding court of appeals's ruling on request for time extension.	0.20 185.00/hr	37.00
11/27/2015 -	JC	Continue review and analysis of voluminous appellate briefing in insured's appeal, toward preparation for upcoming oral argument in insured's and related defendant's appeals.	1.90 185.00/hr	351.50
11/28/2015 -	JC	Continue review and analysis of voluminous appellate briefing in insured's appeal, toward preparation for upcoming oral argument in insured's and related defendant's appeals.	1.80 185.00/hr	333.00
11/30/2015 -	KS	Correspondence from client regarding cross-complaint.	0.40 185.00/hr	74.00
12/1/2015 -	KS	Conference with J. Cunningham regarding today's meeting with client, preparation for oral arguments and request for investigator.	0.50 185.00/hr	92.50
	- JC	Meeting with insured toward preparation for upcoming oral argument in insured's and related defendant's appeals.	2.40 185.00/hr	444.00
	- JC	Continue review and analysis of voluminous appellate briefing in insured's appeal, toward preparation for upcoming oral argument in insured's and related defendant's appeals.	2.80 185.00/hr	518.00
12/2/2015 -	JC	Review and analysis of voluminous insured's and respondents' briefs, and voluminous record on appeal, toward preparation for upcoming oral argument in insured's appeal.	5.90 185.00/hr	1,091.50
12/3/2015 -	JC	Review and analysis of voluminous insured's and respondents' briefs, and voluminous record on appeal, toward preparation for upcoming oral argument in insured's appeal.	4.80 185.00/hr	888.00
12/4/2015 -	JC	Preparation of outline regarding diversity, federal question, and supplemental jurisdiction issues in insured's appeal, toward preparation for upcoming oral argument.	1.20 185.00/hr	222.00
	- KS	Conference with J. Cunningham regarding oral argument discussions with client.	0.40 185.00/hr	74.00
12/5/2015 -	JC	Preparation of outline regarding Insured's anti-SLAPP statute burdens issues in insured's appeal, toward preparation for upcoming oral argument.	1.50 185.00/hr	277.50
	- JC	Preparation of outline regarding respondents' burdens, including under Communications Decency Act, issues in insured's appeal, toward preparation for upcoming oral argument.	1.50 185.00/hr	277.50
12/6/2015 -	KS	Correspondence from client regarding her concerns related to court of appeals, possible cross-claim.	0.40 185.00/hr	74.00
12/7/2015 -	KS	Correspondence with client regarding 12b1.	0.20 185.00/hr	37.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/7/2015	- JC	Meeting with insured toward preparation for oral argument in insured's appeal.	0.80 185.00/hr	148.00
	- JC	Conduct oral argument in insured's appeal.	2.50 185.00/hr	462.50
	- JC	Travel to and from court of appeals in Pasadena for oral argument in insured's appeal.	3.60 185.00/hr	666.00
	- JC	Correspondence with insured regarding preparation of motion to dismiss.	0.30 185.00/hr	55.50
	- KS	Conference with J. Cunningham regarding oral arguments.	0.60 185.00/hr	111.00
12/8/2015	- PB	Assist attorneys Kim Schumann and Jeff Cunningham with status review of case management and post-hearing in preparation for update to carrier	0.20 95.00/hr	19.00
	- KS	Conference with J. Cunningham regarding client's request for investigation.	0.30 185.00/hr	55.50
12/9/2015	- KS	Correspondence with client regarding investigator.	0.30 185.00/hr	55.50
	- JC	Correspondence with insured regarding L. Belcher declaration.	0.20 185.00/hr	37.00
	- KS	Correspondence with client regarding Court of Appeals, possible order, etc.	0.50 185.00/hr	92.50
	- PB	Prepare future handling and strategy memorandum for attorney Kim Schumann	0.20 95.00/hr	NO CHARGE
	- JC	Multiple correspondence with carrier regarding retention of private investigator.	0.30 185.00/hr	55.50
	- KS	Correspondence with client regarding investigator.	0.30 185.00/hr	55.50
	- JC	Draft detailed update with attorney analysis regarding recent oral argument in insured's appeal.	0.80 185.00/hr	148.00
	- KS	Correspondence from client regarding request for 12b1 and 12b6 preparation.	0.20 185.00/hr	37.00
	- KS	Correspondence with carrier regarding client's request for authority.	0.20 185.00/hr	37.00
12/10/2015	- KS	Telephone conference with carrier regarding appeal.	0.20 185.00/hr	37.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/10/2015	- KS	Correspondence with client regarding witness statement.	0.20 185.00/hr	37.00
	- JC	Review court of appeals materials regarding timeline for decision in insured's appeal, regarding preparation of responsive pleadings following remand.	0.30 185.00/hr	55.50
12/14/2015	- JC	Multiple correspondence with insured regarding preparation for statement of witness J. Lichter.	0.30 185.00/hr	55.50
	-			
	- KS	Correspondence with client regarding witness visit.	0.20 185.00/hr	37.00
12/15/2015	- KS	Authority from carrier regarding witness interview.	0.20 185.00/hr	37.00
	- KS	Correspondence with client regarding meeting with witness.	0.20 185.00/hr	37.00
12/17/2015	- JC	Communications with insured regarding preparation for witness J. Lichter statement.	0.30 185.00/hr	55.50
	- JC	Review and analysis of declaration of witness J. Lichter.	0.50 185.00/hr	92.50
	- JC	Multiple correspondence with insured regarding Lichter witness statement, private investigator and witness Belcher.	0.30 185.00/hr	55.50
	- VS	email exchange regarding investigator to locate possible witness	0.10 95.00/hr	9.50
	- VS	Receipt and review declaration of Belcher	0.40 95.00/hr	38.00
	- VS	Receipt and begin review of first amended complaint	0.70 95.00/hr	66.50
	- VS	continue to review first amended complaint	0.10 95.00/hr	9.50
	- KS	Correspondence with client regarding Texas witness.	0.30 185.00/hr	55.50
	- KS	Correspondence with client regarding Arizona witness declaration.	0.30 185.00/hr	55.50
	- KS	Conference with V. Silva regarding investigators.	0.30 185.00/hr	55.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
12/22/2015	- VS	Review email exchange regarding private investigator	0.10 95.00/hr	9.50
	- KS	Conference with J. Cunningham regarding client's witness, Lichter.	0.30 185.00/hr	55.50
	- PB	Assist attorney Kim Schumann by identifying private investigator, Cary Scott to be used in conducting research on witness, Linda Welcher	0.20 95.00/hr	19.00
12/23/2015	- VS	phone call with private investigator Cary Scott regarding locating possible witness Linda Belcher	0.10 95.00/hr	9.50
	- JC	Multiple correspondence with insured regarding assignment of private investigator.	0.30 185.00/hr	55.50
	- VS	Review email exchange regarding witness Linda Belcher's declaration	0.10 95.00/hr	9.50
12/24/2015	- KS	Correspondence with client regarding witness Donna Anders.	0.30 185.00/hr	55.50
12/25/2015	- KS	Correspondence with client regarding communications with investigator.	0.30 185.00/hr	55.50
12/29/2015	- VS	Telephone conference with private investigator regarding locating Linder Belcher, potential witness	0.20 95.00/hr	19.00
	- KS	Correspondence with client regarding information for investigator.	0.30 185.00/hr	55.50
	- JC	Several correspondence with private investigator C. Scott regarding witness L. Belcher.	0.30 185.00/hr	55.50
	- KS	Conference with V. Silva regarding Linda Belcher.	0.20 185.00/hr	37.00
12/30/2015	- PB	Review and analyze preliminary investigative report prepared by Cary Scott regarding witness Linda Belcher	0.30 95.00/hr	28.50
	- VS	communicate to client the details from private investigator's search results of Linda Belcher	0.10 95.00/hr	9.50
	- VS	review details from private investigator's search results of Linda Belcher	0.10 95.00/hr	9.50
	- KS	Correspondence with investigator regarding background of witnesses.	0.30 185.00/hr	55.50
1/4/2016	- KS	Examine correspondence from client regarding Hudson and possible effect on defense.	0.30 185.00/hr	55.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/4/2016 -	VS	Telephone call to Private Investigator regarding locating Donna Anders	0.10 95.00/hr	9.50
1/5/2016 -	VS	Telephone call with private investigator regarding Donna Anders	0.10 95.00/hr	9.50
1/6/2016 -	VS	email exchange with private investigator regarding status of investigation on Donna Anders	0.10 95.00/hr	9.50
1/8/2016 -	KS	Correspondence with investigator.	0.20 185.00/hr	37.00
	- KS	Conference with V. Silva regarding Donna Anders and the status of the Private investigator on locating Ms. Anders.	0.20 185.00/hr	37.00
	- VS	review and analyze case status and strategize regarding next step to execute	0.10 95.00/hr	9.50
	- KS	Correspondence with client regarding missing witness.	0.30 185.00/hr	55.50
1/11/2016 -	KS	Correspondence with client regarding contacts with Linda Belcher.	0.20 185.00/hr	37.00
	- KS	Correspondence with investigator regarding information from client.	0.20 185.00/hr	37.00
	- KS	Correspondence with client regarding information for witness Anders.	0.40 185.00/hr	74.00
1/12/2016 -	KS	Telephone conference with investigator regarding witness.	0.20 185.00/hr	37.00
1/19/2016 -	KS	Conference with V. Silva regarding private investigator and background search conducted on potential witness Donna Anders	0.20 185.00/hr	37.00
1/21/2016 -	KS	Correspondence with client regarding witness questions.	0.30 185.00/hr	55.50
1/22/2016 -		[REDACTED]		
	- KS	Conference with carrier regarding status.	0.20 185.00/hr	37.00
1/25/2016 -		[REDACTED]		
		[REDACTED]		

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/25/2016	- AB	Correspondence to carrier regarding outstanding invoice to Cary Scott, P.I. for professional services.	0.20 95.00/hr	NO CHARGE
	- KS	Correspondence with client regarding dismissal of Florida case.	0.40 185.00/hr	74.00
	- KS	Conference with J. Cunningham regarding use of discovery from Florida case.	0.30 185.00/hr	55.50
1/26/2016	- JC	Multiple correspondence with insured regarding related Liberi v. Belcher case.	0.30 185.00/hr	55.50
	- JC	Begin review and analysis of detailed (18 pages) summary judgment order in Liberi v. IRB case, regarding potential use in insured's case.	0.50 185.00/hr	92.50
1/27/2016	- KS	Correspondence from client regarding her concerns related to Liberi v Belcher.	0.30 185.00/hr	55.50
1/28/2016	- KS	Correspondence with client regarding companion case.	0.20 185.00/hr	37.00
1/29/2016	- KS	Conference with client regarding upcoming Case Management Conference in companion case.	0.20 185.00/hr	37.00
	- JC	Review notice of status conference in related Liberi v. Belcher case, correspondence with insured regarding status conference.	0.30 185.00/hr	55.50
1/30/2016	- KS	Correspondence from client regarding companion case history and client's concerns regarding witness tampering.	0.40 185.00/hr	74.00
1/31/2016	- KS	Conference with J. Cunningham regarding Liberi v Belcher.	0.20 185.00/hr	37.00
	- JC	Several correspondence with insured regarding preparation for interview of witness L. Belcher.	0.40 185.00/hr	74.00
	- KS	Correspondence with client and investigator regarding witness interview.	0.20 185.00/hr	37.00
	- KS	Correspondence with client regarding motion for summary judgment in companion case.	0.80 185.00/hr	148.00
	- KS	Correspondence with client regarding interview of witness Belcher.	0.20 185.00/hr	37.00
2/1/2016	- KS	Correspondence from client regarding her concerns regarding Belcher dismissal and witness access.	0.20 185.00/hr	37.00
	- JC	Several correspondence with insured regarding related Liberi v. Belcher case.	0.50 185.00/hr	92.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/16/2016 -	KS	Correspondence with client regarding witness Belcher, and possible dismissal of federal case.	0.30 185.00/hr	55.50
2/19/2016 -	JC	Correspondence and telephone conference with insured regarding preparation of counterclaim and cross claim in anticipation of decision in appeal.	0.30 185.00/hr	55.50
2/20/2016 -	KS	Correspondence from client regarding questions regarding counterclaim.	0.20 185.00/hr	37.00
3/4/2016 -	KS	Correspondence with carrier regarding sanctions from appeal.	0.20 185.00/hr	37.00
-	KS	Correspondence with client regarding appeal.	0.40 185.00/hr	74.00
-	JC	Several correspondence with insured regarding development of attorney fees claim on anti-Slapp motion to strike.	0.50 185.00/hr	92.50
-	JC	Begin review and analysis pursuant to insured's request of lengthy (50 pages) attorney fee order in Makaeff v. Trump anti-SLAPP case, regarding development of insured's fee claim on anti-SLAPP motion.	0.60 185.00/hr	111.00
3/7/2016 -	KS	Correspondence with carrier and client regarding status meeting.	0.20 185.00/hr	37.00
3/16/2016 -	KS	Correspondence with investigator.	0.20 185.00/hr	37.00
-	KS	Correspondence with client regarding witness interview.	0.30 185.00/hr	55.50
3/18/2016 -	KS	Correspondence from client regarding dismissal of Liberi Texas case.	0.20 185.00/hr	37.00
-	KS	Correspondence from client regarding DOFF trademark issue.	0.20 185.00/hr	37.00
-	KS	Correspondence with client regarding questions for investigator.	0.20 185.00/hr	37.00
3/21/2016 -	KS	Conference with investigator regarding witness interview.	0.20 185.00/hr	37.00
3/22/2016 -	JC	Conference with private investigator regarding witness L. Belcher.	0.40 185.00/hr	74.00
-	JC	Preparation for upcoming conference with private investigator regarding witness L. Belcher.	0.90 185.00/hr	166.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/23/2016	- JC	Conference with KS regarding future handling plan for several additional witness interviews.	0.30 185.00/hr	55.50
3/24/2016	-			
3/25/2016	- KS	Conference with J. Cunningham regarding investigator.	0.30 185.00/hr	55.50
	- JC	Conference with private investigator C. Scott regarding assignment.	0.30 185.00/hr	55.50
4/4/2016	-			
4/7/2016	- KS	Multiple correspondence with client regarding court order, her requested future handling, reconsideration, 12b6, etc.	0.50 185.00/hr	92.50
	- KS	Correspondence from court of appeal regarding ruling.	0.60 185.00/hr	111.00
	- JC	Begin review and analysis of court of appeals' decision in appeals by insured and related defendants.	0.90 185.00/hr	166.50
	- JC	Multiple correspondence and telephone conferences with insured regarding court of appeal decision in her and related defendants' appeals.	0.90 185.00/hr	166.50
	- JC	Begin evaluation of complex issues regarding potential collateral estoppel or law of the case effect of court of appeal decision on insured's potential motions to dismiss.	0.60 185.00/hr	111.00
	- KS	Conference with J. Cunningham regarding strategy for future handling now that discovery will begin.	0.40 185.00/hr	74.00
4/8/2016	- KS	Correspondence with carrier regarding federal order.	0.30 185.00/hr	55.50
	- KS	Conference with J. Cunningham regarding client's requests.	0.30 185.00/hr	55.50
	- JC	Begin evaluation of complex issues regarding insured's potential attorney fees motion in appeal.	0.70 185.00/hr	129.50
	- KS	Correspondence with client regarding strategy meeting.	0.20 185.00/hr	37.00
	- KS	Correspondence from client regarding separate 12b6 motions.	0.20 185.00/hr	37.00
	- JC	Begin evaluation of insured's requested petition for rehearing in appeal.	0.60 185.00/hr	111.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
4/8/2016 -				
4/9/2016 -	KS	Correspondence with client regarding her legal analysis of appeal and request for emergency/ immediate future handling.	0.80 185.00/hr	148.00
	- KS	Conference with J. Cunningham regarding possible strategy for handling client's urgent requests, and for en-banc review.	0.60 185.00/hr	111.00
4/10/2016 -	JC	Continue evaluation of complex issues regarding insured's potential attorney fees motion in appeal.	1.50 185.00/hr	277.50
	- JC	Continue analysis of complex issues regarding potential petitions for rehearing in appeal.	1.50 185.00/hr	277.50
	- KS	Correspondence from client regarding her legal analysis and request that we seek en-banc review.	1.40 185.00/hr	259.00
4/11/2016 -	JC	Draft detailed correspondence with attorney analysis for client regarding potential petitions in appeal and potential motion for attorney fees in appeal.	0.60 185.00/hr	111.00
	- JC	Several correspondence with insured regarding preparation of petition for rehearing in appeal.	0.40 185.00/hr	74.00
	- KS	Correspondence from client regarding her legal analysis.	0.30 185.00/hr	55.50
	- KS	Conference with client regarding appellate records.	0.20 185.00/hr	37.00
	- KS	Amend detailed legal analysis for client.	0.80 185.00/hr	148.00
	- KS	Conference with J. Cunningham regarding client's request for attorney fees.	0.30 185.00/hr	55.50
	- KS	Correspondence from client regarding follow up request related to rehearing.	0.30 185.00/hr	55.50
	- KS	Correspondence with carrier regarding update, client requests for rehearing, analysis thereof.	0.30 185.00/hr	55.50
	- JC	Begin drafting complex petition in insured's appeal for panel rehearing.	1.80 185.00/hr	333.00
4/12/2016 -	JC	Continue drafting complex petition in insured's appeal for panel rehearing.	3.90 185.00/hr	721.50
	- KS	Continue analysis of anti-SLAPP related issues to "rehearing."	1.80 185.00/hr	333.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/12/2016	- KS	Correspondence with client regarding different analysis of case law.	0.80 185.00/hr	148.00
	- JC	Begin analysis of complex issues regarding potential effects of court of appeals' decision on motions to dismiss and for summary judgment.	1.40 185.00/hr	259.00
	- JC	Attorney analysis of insured's requested argument for petition for panel rehearing in insured's appeal, regarding lack of diversity jurisdiction over former defendants.	1.10 185.00/hr	203.50
4/13/2016	- JC	Lengthy meeting with insured regarding preparation of insured's petition for panel rehearing in insured's appeal, and handling of complex jurisdiction issues in appeal.	2.10 185.00/hr	388.50
	- JC	Several correspondence and telephone conferences with insured regarding preparation of petition for review in insured's appeal.	0.60 185.00/hr	111.00
	- JC	Continue drafting complex petition in insured's appeal for panel rehearing.	4.90 185.00/hr	906.50
	- JC	Attorney analysis of complex issues raised by insured regarding diversity jurisdiction and review by Supreme Court regarding decision in insured's appeal.	1.50 185.00/hr	277.50
	- KS	Correspondence with carrier regarding agreed to future handling plan, petition for rehearing, 12b1 and 12b6.	0.30 185.00/hr	55.50
	- KS	Correspondence with client regarding evidence against Ostella.	0.30 185.00/hr	55.50
	- KS	Conference with J. Cunningham regarding client's request that we seek review by the US Supreme Court.	0.50 185.00/hr	92.50
4/14/2016	- KS	Conference with J. Cunningham regarding handling of client appellate requests.	0.30 185.00/hr	55.50
4/15/2016	- KS	Correspondence with client regarding prior action in New Jersey by Ostella.	0.20 185.00/hr	37.00
	- KS	Conference with investigator regarding New Jersey civil filings.	0.20 185.00/hr	37.00
	- KS	Conference with J. Cunningham regarding possible short term discovery plan.	0.30 185.00/hr	55.50
4/17/2016	- KS	Amend petition for rehearing.	0.60 185.00/hr	111.00
4/18/2016	- JC	Continue preparation of insured's petition for panel rehearing in insured's appeal.	2.70 185.00/hr	499.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/18/2016	- JC	Multiple correspondence with insured regarding preparation of insured's petition for panel rehearing in insured's appeal.	0.30 185.00/hr	55.50
	- JC	Begin drafting detailed updated litigation budget and plan.	1.10 185.00/hr	203.50
4/19/2016	-	[REDACTED]		
	- JC	Multiple correspondence with insured regarding preparation of petition for rehearing in insured's appeal.	0.30 185.00/hr	55.50
	- JC	Continue drafting insured's petition for panel rehearing in insured's appeal, and incorporating insureds' new arguments.	2.10 185.00/hr	388.50
	- JC	Correspondence with private investigator C. Scott regarding investigation into plaintiff L. Ostella, and review of criminal case searches regarding Ostella.	0.50 185.00/hr	92.50
	- KS	Correspondence with investigator regarding findings.	0.30 185.00/hr	55.50
	- KS	Conference with J. Cunningham regarding finalizing petition to court of appeal.	0.40 185.00/hr	74.00
4/20/2016	- JC	Continue drafting of insured's detailed petition for panel rehearing in appeal.	0.80 185.00/hr	148.00
	- JC	Continue drafting detailed updated litigation budget and plan.	0.80 185.00/hr	148.00
4/21/2016	- KS	Conference with J. Cunningham regarding budget issues.	0.20 185.00/hr	37.00
	- JC	Draft attorney analysis for carrier regarding insured's and related defendant's petition for rehearing in their appeals, with future handling plan.	0.80 185.00/hr	148.00
	- KS	Finalize further update to carrier.	0.70 185.00/hr	129.50
	- KS	Correspondence with carrier regarding petition for rehearing.	0.30 185.00/hr	55.50
4/22/2016	- JC	Review and analysis of petition for rehearing by appellant, Defend Our Freedoms Foundation (represented by insured O. Taitz), related to insured's petition for rehearing in insured's appeal.	0.80 185.00/hr	148.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/22/2016	- JC	Draft attorney analysis for insured regarding her proposed motions to dismiss in district court, and effect of pending petitions for rehearing in insured's and related defendant's appeals.	0.70 185.00/hr	129.50
	- JC	Continue drafting detailed updated litigation budget and plan.	3.10 185.00/hr	573.50
4/25/2016	- JC	Telephone conference with insured regarding pending petitions for rehearing in appeal, and preparation of motions to dismiss (for lack of jurisdiction and failure to state claims).	0.40 185.00/hr	74.00
	- KS	Conference with carrier regarding status.	0.20 185.00/hr	37.00
	- JC	Begin drafting insured's motion to dismiss regarding lack of subject matter jurisdiction, pursuant to carrier approval.	1.20 185.00/hr	222.00
4/27/2016	- JC	Continue drafting insured's motion to dismiss regarding lack of subject matter jurisdiction, pursuant to carrier approval.	0.90 185.00/hr	166.50
4/29/2016	- JC	Continue drafting insured's motion to dismiss regarding lack of subject matter jurisdiction, pursuant to carrier approval.	1.20 185.00/hr	222.00
	- KS	Conference with J. Cunningham regarding 12b1 motion.	0.40 185.00/hr	74.00
5/1/2016	- KS	Correspondence with investigator regarding NJ background information.	0.40 185.00/hr	74.00
	- JC	Continue drafting insured's motion to dismiss regarding lack of subject matter jurisdiction, pursuant to carrier approval.	1.40 185.00/hr	259.00
5/2/2016	- JC	Continue drafting insured's motion to dismiss regarding lack of subject matter jurisdiction, pursuant to carrier approval.	2.10 185.00/hr	388.50
	- KS	Conference with J. Cunningham regarding motion to dismiss.	0.40 185.00/hr	74.00
5/3/2016	- JC	Multiple correspondence with insured regarding preparation of motion to dismiss (lack of diversity jurisdiction), pursuant to carrier approval.	0.40 185.00/hr	74.00
5/5/2016	- JC	Multiple telephone conferences and correspondence with insured regarding opposition to petitions for rehearing in appeals.	0.50 185.00/hr	92.50
	- JC	Pursuant to insured's request, review Ninth Circuit appellate rules regarding opposition to petitions for rehearing in insured's and related defendant's appeals.	0.50 185.00/hr	92.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/5/2016	- PB	Review and analyze 9th circuit court of appeals register of actions to determine any pending orders regarding submission of paper versions of petition for rehearing	0.20 95.00/hr	19.00
5/16/2016	- JC	Begin drafting insured's Rule 12(b)(6) motion to dismiss amended complaint, pursuant to carrier authority.	0.90 185.00/hr	166.50
5/18/2016	- JC	Continue drafting insured's Rule 12(b)(6) motion to dismiss amended complaint, pursuant to carrier authority.	1.40 185.00/hr	259.00
5/23/2016	- JC	Review of docket in Liberi v. West Valley Detention Center, and related multiple correspondence with insured, regarding potential use for lack of jurisdiction defenses.	0.50 185.00/hr	92.50
	- JC	Review private investigator's documents regarding investigation into civil and criminal cases regarding plaintiff L. Ostella.	0.30 185.00/hr	55.50
	- JC	Several correspondence with insured and investigator G. Valentine regarding court files for plaintiff L. Liberi cases.	0.30 185.00/hr	55.50
	- KS	Correspondence with client regarding expert findings.	0.30 185.00/hr	55.50
	- KS	Correspondence with client regarding court filings, copies, etc.	0.20 185.00/hr	37.00
	- KS	Correspondence with client regarding Ostella's criminal past and other claims in NJ.	0.30 185.00/hr	55.50
	- KS	Correspondence with client and researcher regarding client's request for investigation.	0.40 185.00/hr	74.00
	- JC	Begin drafting insured's Rule 12(f) motion to strike amended complaint, pursuant to carrier authority.	1.60 185.00/hr	296.00
5/24/2016	- JC	Multiple correspondence with insured regarding preparation of FRCP 12(b)(6) motion to dismiss, pursuant to carrier authority.	0.30 185.00/hr	55.50
	- KS	Correspondence with client regarding request for authority for research.	0.20 185.00/hr	37.00
	- KS	Correspondence with carrier regarding investigator findings.	0.20 185.00/hr	37.00
	- KS	Conference with carrier regarding status.	0.20 185.00/hr	37.00
5/25/2016	- JC	Multiple correspondence and telephone conference with insured regarding order on petitions for rehearing in insured's and related defendant's appeals.	0.50 185.00/hr	92.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/25/2016	- JC	Review and analysis of court of appeals order denying insured's petition for rehearing, and related petition of defendant Defend Our Freedoms Foundations.	0.50 185.00/hr	92.50
	- JC	Analysis of timing issues regarding court of appeals order denying insured's petition for rehearing, and under district court order granting leave to file motions to dismiss, regarding mandate to district court and future handling plan.	0.80 185.00/hr	148.00
	- JC	Continue drafting insured's Rule 12(f) motion to strike amended complaint, pursuant to carrier authority.	3.20 185.00/hr	592.00
	- JC	Continue drafting of insured's motion to dismiss under FRCP Rule 12(b)(6), pursuant to carrier authorization.	2.10 185.00/hr	388.50
	- JC	Correspondence with insured regarding drafting of insured's motion to dismiss under FRCP Rule 12(b)(6), pursuant to carrier authorization.	0.20 185.00/hr	37.00
	- KS	Correspondence with client regarding demand for expedite filing of 12(b)(6) motion.	0.20 185.00/hr	37.00
	- KS	Conference with J. Cunningham regarding discovery plan after court's denial of client's motion.	0.30 185.00/hr	55.50
5/26/2016	- JC	Multiple correspondence with insured regarding preparation of request for clarification of order granting leave to file motions to dismiss.	0.30 185.00/hr	55.50
	- JC	Evaluation of insured's protected speech defense in support of motion to dismiss, pursuant to carrier authorization.	0.80 185.00/hr	148.00
	- JC	Continue drafting insured's Rule 12(f) motion to strike amended complaint, pursuant to carrier authority.	3.30 185.00/hr	610.50
	- KS	Conference with J. Cunningham regarding handling after court denial.	0.40 185.00/hr	74.00
5/27/2016	- PB	Assist attorney Jeffrey P. Cunningham in preparation for submitting letter to Judge's panel requesting leave to file motion on behalf of client	0.20 95.00/hr	19.00
	- JC	Multiple correspondence with insured regarding preparation of request to court for leave regarding motions to dismiss and strike, under court pre-filing requirement, and pursuant to carrier approval.	0.30 185.00/hr	55.50
	- PB	Assist attorney Jeff Cunningham by reviewing district court's register of actions to determine date of filing of appeal's decision with district court in preparation for letter to Judge requesting leave to file motion on behalf of client	0.20 95.00/hr	19.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
5/27/2016	- JC	Draft detailed request to court for leave regarding motions for attorney fees under anti-SLAPP statute, under court pre-filing requirement, and pursuant to carrier approval.	0.90 185.00/hr	166.50
	- PB	Finalize written request for leave to file attorneys fees and costs motion and clarification regarding FRCP 12(b)(6) and (f) motions	0.40 95.00/hr	38.00
	- JC	Draft detailed request to court for leave regarding motions to dismiss and strike, under court pre-filing requirement, and pursuant to carrier approval.	1.10 185.00/hr	203.50
5/30/2016	- KS	Correspondence with client regarding 12(b)(6).	0.20 185.00/hr	37.00
5/31/2016	- JC	Multiple correspondence with insured regarding preparation of motions to dismiss and strike.	0.30 185.00/hr	55.50
	-	[REDACTED]		
	- KS	Conference with J. Cunningham regarding client's request.	0.20 185.00/hr	37.00
	- KS	Correspondence with client regarding 12b1 and 12b6 motions.	0.30 185.00/hr	55.50
	- KS	Analyze client's points of argument.	1.40 185.00/hr	259.00
6/1/2016	- JC	Draft attorney analysis for insured regarding order granting leave to file motions to dismiss and strike for all remaining defendants, and toward strategy for filing new motions, pursuant to carrier authority.	0.60 185.00/hr	111.00
	- KS	Correspondence with carrier regarding 12b1/6.	0.30 185.00/hr	55.50
	- JC	Conferences with K. Schumann regarding strategy for insured's motions to dismiss, to strike, and request for leave to file attorney fees motion under anti-SLAPP statute.	0.30 185.00/hr	55.50
	- JC	Begin review and analysis of revised insured's lengthy proposed counterclaim, third party complaint and petition (90 pages), for evaluation regarding effects on defense of plaintiffs' claims.	1.50 185.00/hr	277.50
6/2/2016	- JC	Continue review and analysis of revised insured's lengthy proposed counterclaim, third party complaint and petition (90 pages), for evaluation regarding effects on defense of plaintiffs' claims.	1.10 185.00/hr	203.50
	- KS	Conference with J. Cunningham regarding client's desired cross and counter claims, possible effects on our defense.	0.60 185.00/hr	111.00

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			Hrs/Rate	Amount
6/2/2016	KS	Correspondence with client regarding related federal case against IRB.	0.40 185.00/hr	74.00
	- JC	Begin drafting attorney analysis for insured regarding her proposed counterclaim, third party complaint and petition, including regarding effects on defense of plaintiffs' claims.	0.60 185.00/hr	111.00
	- JC	Multiple correspondence with insured regarding revisions to motion to dismiss regarding related Florida case, pursuant to carrier authority.	0.30 185.00/hr	55.50
6/3/2016	JC	Several telephone conferences with insured regarding development of argument based on related Florida case in support of motion to dismiss, pursuant to carrier approval.	0.40 185.00/hr	74.00
	- JC	Review court of appeals mandate returning jurisdiction to district court.	0.30 185.00/hr	55.50
6/4/2016	JC	Begin review and analysis of order on motion to dismiss in related Liberi v. IRB case, toward support for insured's motion to dismiss pursuant to insured's request and carrier approval.	0.70 185.00/hr	129.50
6/6/2016	JC	Continue review and analysis of order on motion to dismiss in related Liberi v. IRB case, toward support for insured's motion to dismiss pursuant to insured's request and carrier approval.	0.90 185.00/hr	166.50
	- JC	Continue drafting insured's Rule 12(f) motion to strike amended complaint, pursuant to insured's revisions and carrier authority.	2.30 185.00/hr	425.50
	- JC	Continue drafting insured's motion to dismiss amended complaint, pursuant to insured's revisions and carrier authority.	2.90 185.00/hr	536.50
6/7/2016	JC	Multiple correspondence with insured regarding insured's Rule 12(f) motion to strike amended complaint, pursuant to carrier authority.	0.30 185.00/hr	55.50
	- BB	Revise argument and analysis structure on Motion to Strike Plaintiff's First Amended Complaint per client's request	0.90 95.00/hr	85.50
	-			
6/8/2016	KS	Finalize updated responses to client.	0.40 185.00/hr	74.00
	- JC	Multiple correspondence with insured regarding proposed counterclaim and third party complaint.	0.40 185.00/hr	74.00
6/9/2016	KS	Conference with J. Cunningham regarding client's res judicata arguments.	0.60 185.00/hr	111.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
6/9/2016	- KS	Conference with J. Cunningham regarding client's cross claims.	0.40 185.00/hr	74.00
6/10/2016	- JC	Begin evaluation of complex issues regarding application of law of the case doctrine regarding appellate decision, to insured's and other defendants' motions to dismiss and strike, pursuant to carrier approval.	0.90 185.00/hr	166.50
6/13/2016	- JC	Continue evaluation of complex issues regarding application of law of the case doctrine regarding appellate decision, to insured's and other defendants' motions to dismiss and strike, pursuant to carrier approval.	0.80 185.00/hr	148.00
	- KS	Conference with J. Cunningham regarding update on requests to federal court.	0.40 185.00/hr	74.00
6/14/2016	- JC	Multiple correspondence with insured regarding June 14, 2016 order granting leave for motions to dismiss and for attorneys fees.	0.30 185.00/hr	55.50
	- JC	Review June 14, 2016 order granting leave for motions to dismiss and for attorneys fees.	0.30 185.00/hr	55.50
6/15/2016	- JC	Begin review and analysis of plaintiffs' and insured's 2011 discovery disclosures and reports, and objections to reports, regarding potential revisions and additions following remand of case after insured's and related defendants' appeals.	1.60 185.00/hr	296.00
	- JC	Multiple telephone conferences with insured regarding court's order regarding motions to dismiss, strike and for attorney fees.	0.30 185.00/hr	55.50
	- JC	Begin drafting update to carrier regarding appeal, motions to strike to dismiss and strike, motion for attorney fees, and future handling plan.	0.50 185.00/hr	92.50
	- PB	Assist attorney Jeff Cunningham by review and analysis of docket entries made during 2011 specific to Rule 26 compliance in preparation for petition for rehearing on 9th circuit court of appeal	0.40 95.00/hr	38.00
	- JC	Preparation for upcoming meeting with insured regarding preparation of motions to dismiss, strike and for attorney fees, including review of proposed motions and insured's proposed revisions, pursuant to carrier approval..	0.50 185.00/hr	92.50
	- KS	Conference with J. Cunningham regarding client concerns with judge's order.	0.30 185.00/hr	55.50
6/16/2016	- JC	Meeting with insured regarding preparation of several motions to dismiss, strike and for attorneys' fees, discovery and settlement issues, and future handling plan.	1.80 185.00/hr	333.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/16/2016	- KS	Conference with J. Cunningham regarding upcoming discovery.	0.40 185.00/hr	74.00
	- KS	Conference with carrier regarding discovery plan.	0.20 185.00/hr	37.00
	- KS	Correspondence with carrier regarding update from appeal.	0.60 185.00/hr	111.00
6/17/2016	- KS	Conference with J. Cunningham regarding meet and confer with opposing counsels.	0.20 185.00/hr	37.00
	- KS	Correspondence from client regarding trademark violation by plaintiff.	0.40 185.00/hr	74.00
	- JC	Continue review and analysis of plaintiffs' and insured's 2011 discovery disclosures and reports, and objections to reports, regarding potential revisions and additions following remand of case after insured's and related defendants' appeals.	2.10 185.00/hr	388.50
6/19/2016	- KS	Conference with J. Cunningham regarding client's counterclaim.	0.40 185.00/hr	74.00
	- JC	Correspondence with insured regarding motions to dismiss and strike, pursuant to carrier approval.	0.20 185.00/hr	37.00
6/20/2016	- JC	Begin drafting of insured's request for judicial notice supporting motions to strike and dismiss, and pursuant to carrier approval.	1.10 185.00/hr	203.50
	- JC	Meeting with insured regarding preparation of motions to dismiss and strike, for attorney fees, counterclaim and third party complaint, and discovery.	2.80 185.00/hr	518.00
	- JC	Draft meet and confer correspondence to all opposing counsel regarding insured's motions to dismiss and strike, and for attorney fees under anti-SLAPP statute, pursuant to carrier approval.	0.60 185.00/hr	111.00
	- JC	Evaluation of insured's related defendants' proposed FRCP Rule 12 b 6 motion, pursuant to carrier approval.	0.40 185.00/hr	74.00
	- JC	Pursuant to insured request, evaluation of issues regarding potential use of Liberi v. West Valley Detention Center and People v. Richardson file materials to support motion to dismiss, pursuant to carrier approval.	1.20 185.00/hr	222.00
	- JC	Correspondence with insured regarding counterclaim and third party complaint.	0.20 185.00/hr	37.00
	- KS	Meeting with client regarding motions to dismiss and strike, counterclaim, third party complaint, discovery and status.	2.80 185.00/hr	518.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/21/2016	- JC	Continue review and analysis of plaintiffs' and insured's 2011 discovery disclosures and reports, and objections to reports, regarding potential revisions and additions following remand of case after insured's and related defendants' appeals.	0.90 185.00/hr	166.50
	- KS	Conference with J. Cunningham regarding meet and confer strategy pursuant to client request.	0.30 185.00/hr	55.50
	- JC	Draft update with attorney analysis to insured regarding motions to dismiss and strike, and motion for attorney fees, and related future handling plan, pursuant to carrier approval.	0.70 185.00/hr	129.50
	- KS	Correspondence with client regarding meet and confer.	0.30 185.00/hr	55.50
	- KS	Amend update to client.	0.20 185.00/hr	37.00
	- KS	Conference with opposing counsel regarding meet and confer.	0.40 185.00/hr	74.00
6/22/2016	- JC	Begin preparation of extensive issues outline for upcoming meet and confer with opposing counsel, regarding proposed motions to dismiss, strike and for attorneys fees, pursuant to carrier approval.	1.30 185.00/hr	240.50
	- KS	Correspondence with opposing counsel regarding meet and confer.	0.30 185.00/hr	55.50
	- KS	Conference with client regarding Friday's meet and confer.	0.20 185.00/hr	37.00
	- KS	Correspondence with plaintiff's counsel regarding motion to compel client's discovery responses.	0.30 185.00/hr	55.50
6/23/2016	- JC	Drafting of insured's Rule 12 b 6 motion to dismiss, pursuant to and with insured's several revisions, and pursuant to carrier approval.	2.60 185.00/hr	481.00
	- KS	Work on pleadings responses.	0.80 185.00/hr	148.00
	- JC	Continue preparation of extensive issues outline for upcoming meet and confer with opposing counsel, regarding proposed motions to dismiss, strike and for attorneys fees, pursuant to carrier approval.	2.40 185.00/hr	444.00
	- KS	Review client evidence regarding no violation.	0.60 185.00/hr	111.00
	- KS	Analyze client's rule 11 request.	0.40 185.00/hr	74.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/23/2016	- JC	Several correspondence with insured regarding insured's revisions to motions to dismiss and strike, and in preparation for upcoming meet and confer with plaintiffs' counsel on motions, pursuant to carrier approval.	0.50 185.00/hr	92.50
	- KS	Correspondence with carrier regarding updated status.	0.20 185.00/hr	37.00
	- KS	Conference with J. Cunningham regarding 12b1.	0.40 185.00/hr	74.00
6/24/2016	- JC	Continue drafting insured's FRCP Rule 12(b)(6) motion to dismiss, following on and incorporating insured's revisions, pursuant to carrier approval.	2.40 185.00/hr	444.00
	- JC	Conduct meet and confer conference with opposing counsel regarding insured's motions to dismiss and strike, pursuant to carrier approval.	0.60 185.00/hr	111.00
	- JC	Several correspondence and telephone conference with insured regarding drafting insured's FRCP Rule 12(b)(6) motion to dismiss, pursuant to carrier approval.	0.40 185.00/hr	74.00
	- JC	Telephone conference with plaintiff P. Berg regarding meet and confer regarding insured's motions to dismiss and strike, pursuant to carrier approval.	0.20 185.00/hr	37.00
	- KS	Conference with carrier regarding budget.	0.20 185.00/hr	37.00
	- KS	Conference with opposing counsel regarding request to dismiss.	0.60 185.00/hr	111.00
6/26/2016	- JC	Multiple correspondence with insured regarding insured's revisions to motions to dismiss and strike, pursuant to carrier approval.	0.50 185.00/hr	92.50
6/27/2016	- JC	Meeting with insured regarding settlement issues, preparation of motions to dismiss, strike and for attorneys fees, and preparation for settlement meeting with opposing counsel.	1.40 185.00/hr	259.00
	- JC	Correspondence with insured regarding settlement issues, preparation of motions to dismiss, strike and for attorneys fees, and preparation for settlement meeting with opposing counsel.	0.30 185.00/hr	55.50
6/28/2016	- KS	Conference with J. Cunningham regarding client's meet and confer requests.	0.30 185.00/hr	55.50
6/29/2016	- KS	Conference with client regarding meet and confer with opposing counsel.	0.20 185.00/hr	37.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/29/2016	- JC	Correspondence with opposing counsel regarding insured's proposed counterclaim.	0.20 185.00/hr	37.00
	- KS	Conference with J. Cunningham regarding our involvement in client's meet and confer, possible strategy.	0.20 185.00/hr	37.00
	- JC	Several correspondence with insured (also as counsel for co-defendants) regarding meet and confer on insured's and related defendants' motions to dismiss, strike and for attorney fees, pursuant to carrier approval.	0.50 185.00/hr	92.50
6/30/2016	- KS	Correspondence with client and opposing counsel regarding meet and confer.	0.30 185.00/hr	55.50
	- JC	Multiple correspondence with insured (including as counsel for other defendants) regarding preparation for upcoming meet and confer meeting with opposing counsel, regarding insured's and other defendant's motions to dismiss, pursuant to carrier approval.	0.30 185.00/hr	55.50
7/2/2016	- KS	Correspondence with client regarding next week's meet and confer.	0.20 185.00/hr	37.00
7/3/2016	-	[REDACTED]		
7/5/2016	- JC	Multiple correspondence and telephone conference with insured regarding preparation of motions to dismiss and for upcoming conference with opposing counsel pursuant to carrier approval.	0.40 185.00/hr	74.00
7/6/2016	- KS	Conference call with client and opposing counsels.	0.80 185.00/hr	148.00
	- JC	Continue drafting defendants' Rule 12(b)(6) and (b)(1) motions to dismiss, and motion to strike, pursuant to carrier approval.	2.40 185.00/hr	444.00
	- JC	Meeting with insured regarding defendants' motions to dismiss, to strike and for attorney fees, and settlement issues, pursuant to carrier approval.	0.40 185.00/hr	74.00
	- JC	Conduct conference with all counsel regarding defendants' motions to dismiss, to strike and for attorney fees, and regarding settlement issues, pursuant to carrier approval.	1.00 185.00/hr	185.00
7/7/2016	- KS	Begin analysis of evidence, pursuant to client request, for disclosure to opposing counsel as part of private settlement discussions.	3.80 185.00/hr	703.00
	- JC	Draft stipulation regarding defendants' motions to dismiss, pursuant to carrier approval.	0.80 185.00/hr	148.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/7/2016	- JC	Several correspondence and telephone conference with insured, as counsel for other defendants, regarding preparation of stipulation regarding defendants' motions to dismiss and related settlement issues, pursuant to carrier approval.	1.10 185.00/hr	203.50
7/8/2016	- JC	Draft portion of insured's motion to dismiss regarding plaintiffs' appropriation of name causes of action, with insured's revisions, and pursuant to carrier authority.	1.40 185.00/hr	259.00
	- BB	Review and revise Stipulation Regarding Defendant's Motion to dismiss, strike and for attorney fees	0.40 95.00/hr	38.00
	- BB	Review and revise Motion to Dismiss for Lack of Jurisdiction	0.30 95.00/hr	28.50
	- KS	Conference with client regarding possible stipulation with opposing counsel.	0.40 185.00/hr	74.00
	- KS	Correspondence with client regarding opposing counsel's proposed stipulation.	0.40 185.00/hr	74.00
7/9/2016	- JC	Begin review, analysis and redaction of voluminous attorney fees billings (over 300 pages) to support insured's anti-SLAPP attorney fees motion.	1.50 185.00/hr	277.50
7/10/2016	- KS	Conference with client regarding 12b6 and joint stipulation for stay.	0.30 185.00/hr	55.50
	- JC	Continue review, analysis and redaction of voluminous attorney fees billings (over 300 pages) to support insured's anti-SLAPP attorney fees motion.	1.90 185.00/hr	351.50
7/11/2016	- KS	Conference with J. Cunningham regarding joint stipulation with opposing counsels.	0.30 185.00/hr	55.50
	- BB	Review, revise and finalize Stipulation regarding motion to dismiss, strike and for attorneys' fees	0.90 95.00/hr	85.50
	- KS	Conference with client regarding her changes to 12f motion.	0.30 185.00/hr	55.50
	- JC	Several telephone conferences and correspondence with insured regarding preparation of motions to dismiss, attorneys' fees motion, ex-parte application, and settlement issues, pursuant to carrier authority.	1.20 185.00/hr	222.00
7/12/2016	- KS	Correspondence with carrier regarding update, settlement talks, demurrer/ motion to strike and discovery stay.	0.40 185.00/hr	74.00
	- BB	Begin draft of Defendant's Motion to Strike	0.70 95.00/hr	66.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/12/2016	- BB	Begin draft of Defendant's Motion to Dismiss	1.10 95.00/hr	104.50
	- BB	Telephone call to the Clerk regarding the submitted proposed order	0.10 95.00/hr	NO CHARGE
	- BB	Begin draft of Defendants, Defend Our Freedoms and Law Offices of Orly Taitz, Motion to Dismiss	0.70 95.00/hr	66.50
	- JC	Meeting with insured regarding preparation of motions to dismiss, strike, and for attorney fees, and preparation of settlement offer and demand, pursuant to carrier approval.	0.90 185.00/hr	166.50
	- JC	Continue drafting motion to strike and three motions to dismiss, incorporating insured's revisions, pursuant to carrier approval.	2.10 185.00/hr	388.50
	- BB	Preparation of proposed order on extending time to file motions	0.20 95.00/hr	19.00
	- JC	Multiple correspondence with insured regarding preparation of settlement offer.	0.30 185.00/hr	55.50
7/13/2016	- JC	Continue drafting motion to strike and three motions to dismiss, incorporating insured's revisions, pursuant to carrier approval.	2.90 185.00/hr	536.50
	- JC	Multiple correspondence with insured regarding preparation of various motions to dismiss and settlement offer.	0.30 185.00/hr	55.50
	- JC	Continue drafting insured's settlement offer to plaintiffs Liberi, Ostella and Go Excel Global, following on discussions with insured.	0.40 185.00/hr	74.00
7/22/2016	- KS	Correspondence with opposing counsel regarding possible settlement.	0.30 185.00/hr	55.50
	- KS	Conference with J. Cunningham regarding strategy for possible settlement and discovery plan.	0.40 185.00/hr	74.00
7/26/2016	- BB	Telephone call to Court Clerk in Riverside District Court to retrieve the Complaint filed in Liberi v. West Valley Detention Center	0.30 95.00/hr	NO CHARGE
7/28/2016	- KS	Conference with client regarding opposing counsel's e-mail and proposed terms.	0.30 185.00/hr	55.50
	- KS	Correspondence with client regarding security concerns.	0.30 185.00/hr	55.50
7/29/2016	- KS	Conference with client regarding settlement offer.	0.30 185.00/hr	55.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/30/2016	- KS	Correspondence with client regarding response to opposing counsel.	0.20 185.00/hr	37.00
8/1/2016	- KS	Conference with J. Cunningham regarding response to settlement offer.	0.40 185.00/hr	74.00
	- KS	Conference with carrier regarding settlement talks.	0.20 185.00/hr	37.00
	- JC	Multiple correspondence and telephone conferences with insured regarding preparation of counteroffer.	0.70 185.00/hr	129.50
8/4/2016	- JC	Begin drafting of counter-offer by insured, including evaluation of dischargeability in bankruptcy of award under anti-SLAPP statute.	1.50 185.00/hr	277.50
8/5/2016	- JC	Review insured's disclosures regarding insurance, and related correspondence with insured.	0.40 185.00/hr	74.00
	- JC	Several correspondence with insured and other defense counsel regarding preparation of counteroffer.	0.60 185.00/hr	111.00
	- JC	Multiple correspondence with attorney service regarding West Valley Detention Center v. Liberi file.	0.30 185.00/hr	55.50
8/9/2016	- BB	Analyze national archive records to develop impeachment evidence against Plaintiff	0.80 95.00/hr	76.00
	- JC	Numerous correspondence with insured and private defense counsel regarding preparation of counteroffer to Liberi, Ostella and Go Excel Global plaintiffs.	0.60 185.00/hr	111.00
	- JC	Begin review and analysis of insured's proposed revisions to counteroffer, [REDACTED] [REDACTED]	1.20 185.00/hr	222.00
8/10/2016	- KS	Conference with J. Cunningham [REDACTED] [REDACTED]	0.40 185.00/hr	74.00
8/11/2016	- JC	Multiple correspondence with insured regarding Liberi v. West Valley court file, toward obtaining impeachment evidence regarding plaintiff Liberi.	0.30 185.00/hr	55.50
8/16/2016	- KS	Conference with J. Cunningham regarding settlement discussions and possible resolution.	0.40 185.00/hr	74.00
8/18/2016	- KS	Correspondence with carrier regarding update.	0.30 185.00/hr	55.50
8/23/2016	- KS	Correspondence with client regarding trademark.	0.20 185.00/hr	37.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
8/23/2016	- BB	Further Analysis of national archive records to develop impeachment evidence against plaintiff	0.40 95.00/hr	38.00
	- JC	Multiple correspondence with insured regarding settlement and preparation of motions to dismiss.	0.30 185.00/hr	55.50
8/24/2016	- KS	Correspondence with client regarding settlement discussions.	0.30 185.00/hr	55.50
	- KS	Correspondence with client and court clerk regarding prior case evidence against plaintiffs.	0.80 185.00/hr	148.00
8/26/2016	- KS	Conference with J. Cunningham regarding possible settlement.	0.40 185.00/hr	74.00
	- JC	Conference with insured regarding opposing counsel's 8/26/16 response to insured's counteroffer, and development of insured's reply arguments.	0.40 185.00/hr	74.00
	- JC	Review opposing counsel's 8/26/16 response to insured's counteroffer. Begin development of insured's reply arguments.	0.40 185.00/hr	74.00
8/27/2016	- KS	Correspondence with opposing counsel regarding settlement discussions.	0.80 185.00/hr	148.00
8/28/2016	- JC	Begin drafting comprehensive settlement agreement.	2.30 185.00/hr	425.50
8/29/2016	- JC	Continue drafting comprehensive settlement agreement including with insured's revisions.	4.10 185.00/hr	758.50
	- JC	Multiple correspondence and telephone conferences with insured regarding settlement agreement.	0.50 185.00/hr	92.50
8/30/2016	- KS	Correspondence with client regarding settlement agreement language.	0.30 185.00/hr	55.50
	- JC	Evaluation of legal issues regarding motion for order reserving jurisdiction over settlement, toward preparation of settlement agreement.	0.50 185.00/hr	92.50
	- JC	Several correspondence and telephone conferences with insured regarding settlement agreement.	1.10 185.00/hr	203.50
8/31/2016	- KS	Multiple correspondence with client regarding filing motions / extension of time.	0.40 185.00/hr	74.00
	- KS	Conference with carrier regarding status of settlement negotiations.	0.30 185.00/hr	55.50
	- KS	Conference with J. Cunningham regarding settlement agreement changes and strategy.	0.80 185.00/hr	148.00

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		<u>Hrs/Rate</u>	<u>Amount</u>
8/31/2016 - JC	Multiple correspondence with opposing counsel regarding revisions to settlement agreement.	0.30 185.00/hr	55.50
	For professional services rendered	2597.35	\$432,789.03

Additional Charges :

		<u>Qty/Price</u>	<u>Tax#</u>
7/15/2011 - TEL	U.S. Court of Appeal Docket Fee.	1 455.00	455.00
7/25/2011 - TEL	Hearing transcript for appeal.	1 116.64	116.64
7/31/2011 - TEL	Copies made in-house during this month: July, 2011.	71 0.07	4.97
8/17/2011 - TEL	Filing fees paid to Lexis Nexis.	1 296.70	296.70
- TEL	Filing fees paid to Lexis Nexis.	1 445.99	445.99
- TEL	FedEx delivered on 7/29/11 to Denise Paddock, Official Court Record, LLC.	1 10.38	10.38
8/31/2011 - TEL	Copies made in-house during this month: August, 2011.	110 0.07	7.70
9/6/2011 - TEL	Nationwide Legal, LLC. Copy Charges incurred on: 7/12/11 at USDC/ Santa Ana.	1 48.50	48.50
- TEL	Nationwide Legal, LLC. Filing fees incurred on: 7/14/11 at USDC/ Santa Ana.	1 20.00	20.00
9/29/2011 - TEL	Nationwide Legal, LLC. Filing fees incurred on: 7/25/11 at USDC/ Santa Ana.	1 55.00	55.00
- TEL	Nationwide Legal, LLC. Rush Delivery charges incurred on: 7/26/11 to USDC/ Santa Ana - Reply Brief by Orly Taitz.	1 35.00	35.00
- TEL	Nationwide Legal, LLC. Messenger charges incurred on: 7/18/11 to USDC/ Santa Ana.	1 15.00	NO CHARGE
- TEL	Nationwide Legal, LLC. Rush Delivery charges incurred on: 7/20/11 to USDC/ Santa Ana - Motion to Strike and related paperwork.	1 101.25	101.25

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			<u>Qty/Price</u>	<u>Tax#</u>	<u>Amount</u>
9/29/2011	- TEL	Nationwide Legal, LLC. Rush Delivery charges incurred on: 7/20/11 to USDC/ Santa Ana - Motion to Dismiss and related paperwork.	1 71.25		71.25
10/14/2011	- TEL	Nationwide Legal fee for Rush research at USDC/ Santa Ana.	1 65.00		65.00
	- TEL	Nationwide Legal, LLC. Rush Research charges incurred on: 8/22/11 at USDC/ Central.	1 67.00	NO CHARGE	
	- TEL	Rush research charges incurred on 8/22/11 at USDC/ Riverside.	1 151.00		151.00
10/18/2011	- TEL	Nationwide Legal, LLC. Messenger charges incurred on: 8/2/11 to USDC/ Santa Ana.	1 51.50	NO CHARGE	
	- TEL	Nationwide Legal, LLC. Messenger charges incurred on: 8/2/11 to USDC/ Santa Ana.	1 65.00	NO CHARGE	
	- TEL	Nationwide Legal, LLC. Messenger charges incurred on: 8/9/11 from USDC/ Santa Ana.	1 71.00	NO CHARGE	
12/31/2011	- TEL	Copies made in-house during this month: December, 2011.	901 0.07		63.07
1/31/2012	- TEL	Copies made in-house during this month: January, 2012.	39 0.07		2.73
2/14/2012	- TEL	First Legal Network Filing fees incurred on: 12/22/11 at US Court of Appeal	1 55.00		55.00
2/15/2012	- TEL	First Legal Network Filing fees incurred on: 12/19/11 at US Court of Appeal, San Francisco.	1 55.00		55.00
2/29/2012	- TEL	Copies made in-house during this month: February, 2012.	489 0.07		34.23
3/14/2012	- TEL	Filing fees paid to Pacer for federal filing and appellate filing.	1 52.16		52.16
3/20/2012	- TEL	AT&T Teleconference fee on 2/09/12.	1 20.93		20.93
4/30/2012	- JL	Copies made in-house during this month: April, 2012.	31 0.07		2.17
5/31/2012	- JL	Copies made in-house during this month: May, 2012.	21 0.07		1.47
	- JL	First Legal Network Filing fees incurred on: 4/25/12 at US Court of Appeal.	1 55.00		55.00

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			<u>Qty/Price</u>	<u>Tax#</u>	<u>Amount</u>
8/31/2012 - JL	Copies made in-house during this month: August, 2012.		37 0.07		2.59
11/30/2012 - JL	Copies made in-house during this month: November, 2012.		111 0.07		7.77
12/31/2012 - JL	Copies made in-house during this month: December, 2012.		12 0.07		0.84
1/14/2013 - JC	Mileage to/from OCSC - Santa Ana.		11 0.57	NO CHARGE	
- JC	Parking fee		1 3.00	NO CHARGE	
1/31/2013 - JL	Copies made in-house during this month: January, 2013.		368 0.07		25.76
- JL	Records fee paid to Merrill Communications.		1 133.49		133.49
2/6/2013 - JC	Mileage to/ from Pasadena courthouse.		94 0.57	NO CHARGE	
2/28/2013 - JL	Copies made in-house during this month: February, 2013.		721 0.07		50.47
3/31/2013 - JL	Copies made in-house during this month: March, 2013.		386 0.07		27.02
4/30/2013 - JL	Copies made in-house during this month: April, 2013.		346 0.07		24.22
5/31/2013 - JL	Copies made in-house during this month: May, 2013.		419 0.07		29.33
6/17/2013 - JC	Mileage to/from OCSC for hearing.		10.6 0.57	NO CHARGE	
- JC	Parking at OCSC.		1 3.00		3.00
6/30/2013 - JL	Copies made in-house during this month: June, 2013.		470 0.07		32.90
7/17/2013 - JL	Filing fees paid to Pay.gov for Notice of Appeal.		1 455.00		455.00
7/31/2013 - JL	Copies made in-house during this month: July, 2013.		44 0.07		3.08

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			<u>Qty/Price</u>	<u>Tax#</u>	<u>Amount</u>
8/15/2013	- JL	Cost of hearing transcript on Anti-SLAPP Motion paid to Official Court Record, LLC	1 170.82		170.82
8/31/2013	- JL	Copies made in-house during this month: August, 2013.	77 0.07		5.39
11/30/2013	- JL	Copies made in-house during this month: November, 2013.	103 0.07		7.21
12/31/2013	- JL	Copies made in-house during this month: December, 2013.	286 0.07		20.02
1/31/2014	- JL	Copies made in-house during this month: January, 2014.	103 0.07		7.21
2/3/2014	- JC	Mileage to/from OCSC - Santa Ana.	10.6 0.56	NO CHARGE	
	- JC	Parking fee at OCSC - Santa Ana.	1 2.00		2.00
2/28/2014	- JL	Copies made in-house during this month: February, 2014.	118 0.07		8.26
4/30/2014	- JL	Copies made in-house during this month: April, 2014.	50 0.07		3.50
5/31/2014	- JL	Copies made in-house during this month: May, 2014.	52 0.07		3.64
6/30/2014	- JL	Copies made in-house during this month: June, 2014.	326 0.07		22.82
7/15/2014	- JL	FedEx delivered on 6/30/14 to James R. Browning Courthouse, as instructed by Court.	1 84.58		84.58
	- JL	FedEx delivered on 6/30/14 to James R. Browning Courthouse, as instructed by Court.	1 57.76		57.76
	- JL	FedEx delivered on 6/30/14 to James R. Browning Courthouse, as instructed by Court.	1 84.58		84.58
	- JL	FedEx delivered on 6/30/14 to James R. Browning Courthouse, as instructed by Court.	1 84.58		84.58
7/25/2014	- JL	Nationwide Legal, LLC. Court charges incurred on: 6/27/14 at Court of Appeals, Pasadena.	1 130.00		130.00
7/31/2014	- JL	Copies made in-house during this month: July, 2014.	460 0.07		32.20

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			<u>Qty/Price</u>	<u>Tax#</u>	<u>Amount</u>
8/31/2014 -	JL	Copies made in-house during this month: August, 2014.	704 0.07		49.28
9/30/2014 -	JL	Copies made in-house during this month: September, 2014.	88 0.07		6.16
10/7/2014 -	JL	FedEx delivery to James R. Browning Courthouse in San Francisco for filing of appellate briefs, pursuant to carrier authority.	1 132.98		132.98
11/7/2014 -	JL	Records fee paid to Merrill Communications.	1 123.91		123.91
2/28/2015 -	JL	Copies made in-house during this month: February, 2015.	222 0.07		15.54
3/31/2015 -	JL	Copies made in-house during this month: March, 2015.	167 0.07		11.69
6/3/2015 -	JL	Nationwide Legal, LLC. Court charges incurred on: 4/20/15 at San Bernardino Courthouse.	1 114.90		114.90
10/30/2015 -	JL	Copies made in-house during this month: October, 2015.	39 0.07		2.73
12/7/2015 -	JC	Mileage to/from Pasadena Courthouse.	100 0.58	NO CHARGE	
12/31/2015 -	JL	Copies made in-house during this month: December, 2015.	300 0.07		21.00
1/31/2016 -	JL	Copies made in-house during this month: January, 2016.	78 0.07		5.46
2/29/2016 -	JL	Copies made in-house during this month: February, 2016.	90 0.07		6.30
3/31/2016 -	JL	Copies made in-house during this month: March, 2016.	10 0.07		0.70
4/30/2016 -	JL	Copies made in-house during this month: April, 2016.	374 0.07		26.18
5/31/2016 -	JL	Copies made in-house during this month: May, 2016.	182 0.07		12.74
6/30/2016 -	JL	Copies made in-house during this month: June, 2016.	392 0.07		27.44
7/29/2016 -	JL	Nationwide Legal, LLC. Court charges incurred on: 7/11/16 at USDC/ Santa Ana.	1 38.00		38.00

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	<u>Qty/Price</u>	<u>Tax#</u>	<u>Amount</u>
7/31/2016 - JL Copies made in-house during this month: July, 2016.	609 0.07		42.63
8/9/2016 - JL Fee paid to Clerk of U.S. District Court for Complaint in National Archives.	1 142.00		142.00
8/31/2016 - JL Copies made in-house during this month: August, 2016.	70 0.07		4.90
Total costs			<u>\$4,530.72</u>
For professional services rendered	<u>2597.35</u>		<u>\$437,319.75</u>